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EX	HIB	BIT	2	
v. Permanent Mission of the RO 7 1:21-cv-06165-AJN		efendant's Motion	for Summary Judgment	

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022

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1	UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK
2	SOUTHERN DISTRICT OF NEW TORK
3	Case No.: 1:21-CV-06165
4	HYUNHUY NAM,
5	Plaintiff, VIDEOCONFERENCE DEPOSITION OF:
6	HYUNHUY NAM -against-
7	PERMANENT MISSION OF THE REPUBLIC OF KOREA TO THE UNITED NATIONS,
9	Defendants.
10	
11	
12	
13	TRANSCRIPT of the testimony of HYUNHUY NAM in
14	the above-entitled matter, as taken by and before
15	CELESTE A. GALBO, a Certified Court Reporter and
16	Notary Public of the State of New Jersey, held at the
17	offices of Kim, Cho & Lim, LLC, 460 Bergen Boulevard,
18	Palisades Park, New Jersey, on February 22, 2022,
19	commencing at 10:09 a.m.
20	
21	
22	
23	
24	
25	

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 2...5

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2			2		
3	HANG & ASSOCIATES, PLLC		3	DEFENDANT'S DESCRIPTION F	PAGE
4	BY: SHAN ZHU, ESQ. YONGJIN BAE, ESQ.		4		
T	136-20 38th Street		5	Exhibit 13 handwritten notes	110
5	Flushing, New York 11354		6	Exhibit 14 text messages	117
6	718-353-8588		7	Exhibit 15 letter from the Ministry of Foreign	
7	szhu@hanglaw.com			Affairs of the Republic of Korea	128
	ybae@hanglaw.com		8		
8			9	(Exhibits retained by Mr. Kwak.)	
	Attorneys for the Plaintiff		10		
9			11		
10	VIV. 010 6 1 TV. 1 I G		12		
11	KIM CHO & LIM, LLC BY: JOSHUA S. LIM, ESQ.		13	REQUEST FOR DOCUMENTS:	
12	SEAN KWAK, ESQ.		14	PAGE LINE	
	460 Bergen Boulevard		15	27 2	
13	Palisades Park, New Jersey 07650		-	106 13	
14	201-740-2953		16	123 25	
15	seankwak@kcllawfirm.com		**	125 25	
16	Attorneys for the Defendant		17	127 2	
17			18		
18	ALSO PRESENT:		19	DIRECTIONS NOT TO ANSWER:	
19	Fran Yoon, Korean interpreter	1-14 6			
20	Jo Jinha, Esq., Permanent Mission of the Rep Korea to the United Nations	ubilc of	20	PAGE LINE	
20	Taeho Kim		21	126 7	
21	racio kim			126 19	
22			22		
23			23		
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25			25		
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1	INDEX	Ö	1	IT IS HEREBY STIPULATED AND AGREED	0
2			2	by and between the attorneys for the respective	
3	WITNESS PAGE	Ξ	3	parties herein, that filing and sealing be and the	e
4	HYUNHUY NAM		4	same are hereby waived.	
	BY MR. LIM 6	_		-	
5	BY MR. ZHU 130)	5	IT IS FURTHER STIPULATED AND AGREED	
6			6	that all objections, except as to the form of the	
7			7	question, shall be reserved to the time of the tr	ial.
8	P V II T T III C		8	IT IS FURTHER STIPULATED AND AGREED	
9	EXHIBITS		9	that the within deposition may be signed and sworn	n to
9 10	DEFENDANT'S DESCRIPTION	PAGE			
11	Exhibit 1 2016 contract and translation	PAGE 22	10	before any officer authorized to administer an oat	
12	Exhibit 2 2017 papers with translation	27	11	with the same force and effect as if signed and so	worn
13	Exhibit 3 2018 papers with translation	31	12	to before the Court.	
14	Exhibit 4 2019 papers and translation	35	13		
15	Exhibit 5 2020 papers with translation	39	14		
16	Exhibit 6 2021 papers with translation	40			
17	Exhibit 7 consent form	43	15		
18	Exhibit 8 time records	52	16		
19	Exhibit 9 dictionary definition of the		17	-0-	
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HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 6..9

1	Page 6 FRAN YOON, was duly sworn by the Notary Public to	1	Page 8 why you're doing it, however, you have to verbalize,
2	interpret the proceedings from English to Korean, and	2	verbalize your response at all times. Let me explain
3	from Korean to English.	3	what I mean by that. If you shake your head or nod,
4	HYUNHUY NAM, residing at 128 W. Central Boulevard,	4	that is not a sufficient response. Why? Because the
5	Palisades Park, New Jersey 07680 having been duly	5	court reporter today, she'll take down whatever I say
6			
	sworn by the Notary Public, was examined and	6	or whatever you say, whatever is discussed in this
7	testified as follows:	7	proceeding. Later on she'll produce what we call a
8	EXAMINATION	8	transcript. And when we look at the transcript, if
9	BY MR. LIM:	9	you shook your head or nod it and later on when we
10	Q. All right. Good morning, Mr. Nam. Let	10	try to use it for future proceedings in the court, we
11	me briefly introduce myself. My name is Joshua Lim.	11	don't know what you meant by that. Hence, it is very
12	I am one of the attorneys representing the defendant	12	important for you to verbalize your response with the
13	in this case Permanent Mission of the Republic of	13	assistance of the interpreter, Ms. Yoon.
14	Korea to the United Nations. To my right my	14	Do you understand that, sir?
15	associate Sean Kwak is present. From time to time if	15	A. Yes.
16	necessary, Mr. Sean may also ask you some questions,	16	Q. Number two, from time to time your good
17	although I'll be the one taking the meeting today.	17	counsel may say what we call objection. But under
18	Okay. And for purposes of today's	18	the court rules, they cannot do speaking objection.
19	proceeding I'm going to refer to the defendant as	19	In other words, they cannot object in a way that
20	"the Mission". No other name should be used for the	20	coaches you how to answer. He cannot tell you how to
21	purpose of clarity and consistency. So, when you're	21	answer or what to say. That is strictly prohibited
22	testifying, I want you to consistently refer to I	22	by rule. All they can do, they can just say
23	guess perhaps I'm asking Ms. Yoon, the translator, to	23	objection to the form. If they say objection to the
24	refer to the defendant as the Mission.	24	form, allow their objection to be placed on the
25	A. Understood.	25	record and move on, you still have to answer my
1	Page 7	1	Page 9
1 2	Q. Now, you are here for a proceeding	1 2	question. Understand?
2	Q. Now, you are here for a proceeding known as a deposition. Have you been deposed before?	2	question. Understand? A. Yes.
2 3	Q. Now, you are here for a proceeding known as a deposition. Have you been deposed before? A. Yes.	2 3	question. Understand? A. Yes. Q. And there is a confidentiality order
2 3 4	Q. Now, you are here for a proceeding known as a deposition. Have you been deposed before? A. Yes. Q. When was the last time that you were	2 3 4	question. Understand? A. Yes. Q. And there is a confidentiality order signed by Judge Nathan. Let me explain to you the
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Now, you are here for a proceeding known as a deposition. Have you been deposed before? A. Yes. Q. When was the last time that you were deposed? A. About 2011. Q. Okay. Why did you have to be deposed? A. It was a deposition concerning a workers' comp case with CRST Trucking Company. Q. So that's back in what, 2010 or '11? A. Correct. Q. Since then are you saying that you've never been deposed until today? A. Correct. Q. Okay. Now, I'm going to give you some rules. I know you were deposed once before, but these are the cardinal rules that will control today's proceeding. These are very important and I expect you to abide by these rules at all times from the beginning to the end. Number one, I'm going to ask you a	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yes. Q. And there is a confidentiality order signed by Judge Nathan. Let me explain to you the legal significance of that. Before we begin, counsel and I, your counsel, we discussed and we agreed that if you're about to say something that is considered confidential, we're going to go off the record and discuss how it should be handled first and then we're going to go back to the record. Do you understand this, sir? A. Yes. Q. And I don't think it will happen but I'm going to tell you anyhow, if you're about to say something that involves your communication with your counsel, I'm not entitled to know and I don't want to know. So you don't have to tell me what you discussed with your counsel and I'm not entitled to know. Okay? A. Understood. Q. Barring that, you have to answer all my
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Now, you are here for a proceeding known as a deposition. Have you been deposed before? A. Yes. Q. When was the last time that you were deposed? A. About 2011. Q. Okay. Why did you have to be deposed? A. It was a deposition concerning a workers' comp case with CRST Trucking Company. Q. So that's back in what, 2010 or '11? A. Correct. Q. Since then are you saying that you've never been deposed until today? A. Correct. Q. Okay. Now, I'm going to give you some rules. I know you were deposed once before, but these are the cardinal rules that will control today's proceeding. These are very important and I expect you to abide by these rules at all times from the beginning to the end. Number one, I'm going to ask you a number of questions related to the lawsuit that you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yes. Q. And there is a confidentiality order signed by Judge Nathan. Let me explain to you the legal significance of that. Before we begin, counsel and I, your counsel, we discussed and we agreed that if you're about to say something that is considered confidential, we're going to go off the record and discuss how it should be handled first and then we're going to go back to the record. Do you understand this, sir? A. Yes. Q. And I don't think it will happen but I'm going to tell you anyhow, if you're about to say something that involves your communication with your counsel, I'm not entitled to know and I don't want to know. So you don't have to tell me what you discussed with your counsel and I'm not entitled to know. Okay? A. Understood. Q. Barring that, you have to answer all my questions today.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Now, you are here for a proceeding known as a deposition. Have you been deposed before? A. Yes. Q. When was the last time that you were deposed? A. About 2011. Q. Okay. Why did you have to be deposed? A. It was a deposition concerning a workers' comp case with CRST Trucking Company. Q. So that's back in what, 2010 or '11? A. Correct. Q. Since then are you saying that you've never been deposed until today? A. Correct. Q. Okay. Now, I'm going to give you some rules. I know you were deposed once before, but these are the cardinal rules that will control today's proceeding. These are very important and I expect you to abide by these rules at all times from the beginning to the end. Number one, I'm going to ask you a number of questions related to the lawsuit that you brought against my client, that you'll be asked to	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. And there is a confidentiality order signed by Judge Nathan. Let me explain to you the legal significance of that. Before we begin, counsel and I, your counsel, we discussed and we agreed that if you're about to say something that is considered confidential, we're going to go off the record and discuss how it should be handled first and then we're going to go back to the record. Do you understand this, sir? A. Yes. Q. And I don't think it will happen but I'm going to tell you anyhow, if you're about to say something that involves your communication with your counsel, I'm not entitled to know and I don't want to know. So you don't have to tell me what you discussed with your counsel and I'm not entitled to know. Okay? A. Understood. Q. Barring that, you have to answer all my questions today. A. Understood.

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 10..13

	Tryumiuy Man	·	1 ages 1013
1	Page 10 is no judge or jury today, however, Mr. Nam, the	1	Page 12 federal ruling in the matter, you're not allowed to
2	answer you're about to give has the same force and	2	discuss your prior testimony with your counsel during
3	effect as if you're testifying in a court of law.	3	a break. You can talk to your counsel about other
4	You raised your right hand, you're under oath. You	4	things, but you cannot talk your counsel during the
5	understand that, right? That means if you willfully	5	break about, hey, how did I do, should I go back and
6	lie that you will be subjected to punishment.	6	change my answer. You are not allowed to do that.
7	You understand that, sir?	7	In that case under the case rule, we're allowed to
8	A. Yes.	8	ask you and your counsel what you actually discussed.
9	Q. So no speculation, no guess, no	9	In other words, that attorney/client privilege may be
10	exaggeration, facts, facts, and facts only. Are we	10	lifted. So I just wanted to be careful about that.
11	clear about this?	11	Okay, go ahead, sir.
12	A. Yes.	12	MR. ZHU: So just I instruct you that
13	Q. Okay. And luckily with the cooperation	13	you need to wait for the answer I'm sorry, wait
14	of your good counsel we already have most of the	14	for the question before you give the answer.
15	answers, we just want to confirm a few things.	15	MR. LIM: Thank you. I appreciate
16	You understand that?	16	that.
17	A. Yes.	17	Q. Mr. Nam, we have your full name here as
18	Q. By the way, I have to commend your good	18	indicated in the caption Hyunhuy Nam; is that
19	counsel, your counsel has been very cooperative and	19	correct?
20	courteous throughout the proceeding, and we	20	A. Hyunhuy Nam.
21	anticipate that we'll continue to work together well.	21	Q. Okay. Do you have an English name?
22	Now, we have a translator for a reason.	22	A. No.
23	You have to go through the translator at all times.	23	Q. Okay. Your date of birth is April 9,
24	The reason why I'm telling you this is because you	24	1960?
25	may understand some English, so from time to time you	25	A. Correct.
23	may mader beat migriphy bo from time to time for	25	n. correct.
,	Page 11	1	Page 13
1	may just blurt out your answers in English. If you	1	Q. Are you currently residing at 128 West
3	continue to speak in English and then I'll ask your	2	Central Boulevard, Palisades Park, New Jersey?
4	counsel whether or not you really need a translator. Do you understand?	3 4	A. Yes. Q. However, during the course of your
5	A. Understood.	5	
6		6	employment at the Mission, you reside at 55 West Homestead Avenue, correct, 55?
7	Q. So you have to go through the translator at all times.	7	A. 55, yes.
8	Now, before we begin, is there any	8	Q. Are you married?
9	reason at all that may impair your ability to tell	9	A. Yes.
		10	
10	the truth today, physical, psychological or otherwise? Do you have any reason at all that it	11	Q. With children? A. Yes.
12	will make it difficult for you to tell the truth?	12	Q. Who are you living with today?
13	A. No.	13	A. With my wife.
14	Q. Okay. So you're ready to tell the	14	Q. Anyone else?
15	truth?	15	A. From time to time my daughter comes to
16	A. Correct.	16	visit us.
17	Q. To all the questions, correct?	17	Q. So you're just living with your wife;
18	A. Correct.	18	is that correct?
19	MR. ZHU: One instruction to the	19	A. Correct.
20	witness	20	Q. Let's go over your employment history.
21	MR. LIM: I forgot one	21	Are you currently employed?
22	MR. ZHU: Go ahead.	22	A. Yes.
23	MR. LIM: Thank you.	23	Q. Where are you working?
24	Q. We'll probably take a break from time	24	A. Sunrise, LLC.
25	to time, but under the Judge Salas' rule, it's a	25	Q. Where is it?
			X. MADES IN IO.

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 14..17

		Hyunnuy Nan	1 011	02/22/2022 Pages 141
1	3	Page 14		Page 16
1	Α.	In Secaucus.	1	A. Well, I didn't work as a truck driver
2	Q.	What kind of company is this?	2	continuously, so it's difficult to say. But I would
3	Α.	It's a trucking company.	3	say about ten years.
4	Q.	How many hours do you work there?	4	Q. When did you come to the United States?
5	A.	40 hours a week.	5	MR. ZHU: Objection. Relevancy.
6	Q.	When did you start working for this	6	You can answer.
7	company?		7	A. Well, I can't recall if it was January
8	A.	July 29, 2021.	8	2007 or 2008, however it was after 2007 and my entire
9	Q.	Do you have any other job other than	9	family emigrated to this country in or around January
10	this?		10	2017 not 2017 but 2007.
11	A.	No.	11	Q. You just talked about your family. My
12	Q.	Okay. Prior to that, where did you	12	question is, when did you come to the United States?
13	work?		13	MR. ZHU: Objection. Asked and
14	A.	My last job prior to my current job was	14	answered.
15	at the Missi	on. And after my work was terminated for	15	You can answer.
16	one month, I	didn't work, and then I started working	16	A. I visited this country or I came I
17	for Sunrise,	·	17	was back and forth in this country many times, so.
18	Q.	How much are you earning now?	18	Q. My question is, when did you immigrate
19	**	MR. ZHU: Objection. Relevance.	19	to the United States?
20		You can answer.	20	MR. ZHU: Objection to you inquiring
21	Α.	On average about \$4,000.	21	about the immigration status.
22	Q.	4,000 a month?	22	MR. LIM: Counsel, let me remind you of
23	Α.	Yes.	23	•
	Α.			the case, the KOTRA case. One of the factors the
24		MR. ZHU: Interpreter, if you can maybe	24	Court considered was the nationality of the
25	translate my	objection to the witness.	25	plaintiff. Okay? So that's the reason why I'm
		Page 15		Page 17
1		THE INTERPRETER: Sure. Sure.	1	asking. You can put an objection on the record but
2	Q.	What is your highest level of	2	it's relevant. Okay.
3	education?		3	Q. So, sir, I can care less about whether
4	A.	Four-year university.	4	you're legal or illegal. I don't care about that.
5	Q.	Where?	5	My question is are you South Korean national?
6	A.	Seoul.	6	A. Yes.
7	Q.	What's the name of the school?	7	Q. You're not a naturalized American
8	A.	Sungkyunkwan University.	8	citizen yet, correct?
9	Q.	What did you study?	9	A. Correct.
10	A.	Okay. My major was in German language	10	Q. After you came to the United States,
11	and minored	in administration.	11	would it be fair to say that most of the time you
12	Q.	Prior to working at the Mission, where	12	worked as a truck driver?
13	did you work	- · · · · · · · · · · · · · · · · · · ·	13	A. Yes.
14	A.	Cora Express, C-O-R-A.	14	Q. When you worked as a truck driver, was
15	Q.	Where is it?	15	your driving just limited to East Coast area or
16	ν. Α.	In Hackensack. It's near Hackensack, I	16	certain areas or did you drive across the country?
17		the specific town.	17	A. Across the country.
		=		•
18	Q.	What did you do there?	18	Q. Do you speak some English?
	Α.	It's a trucking company.	19	A. Just enough to get by as a truck
19	Q.	Were you a truck driver?	20	driver.
20		Yes.	21	Q. Would you say that your English is a
20 21	A.		22	conversational level?
20	A. Q.	How long did you work there for?		conversational level?
20 21		How long did you work there for? Two years.	23	A. Well, I wouldn't say perfect, however,
20 21 22	Q.	•		

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 18..21

		Hyunnuy Ivan	ı vii	1 ages 10
1	instructions	Page 18	1	Page 2 Q. Chauffeur. Did you have an interview?
2	A.	Correct.	2	
3	Q.	Would you consider yourself an	3	Q. I'm not going to ask you to identify
4	experienced	driver?	4	
5	- A.	Yes.	5	
6	Q.	Would you say that you are a very	6	A. Choi.
7	reliable dri		7	Q. At the time did you bring your resume
8	Α.	Yes.	8	to the interview?
9	Q.	Would you say that you operate the	9	A. Yes.
10	_	very safe manner?	10	
11	Α.	Yes.	11	
12	Q.	How many accidents have you had in the	12	,
13	past?		13	• •
14	Α.	If you're talking about a car accident,	14	
15		ally one minor car accident.	15	
16	Q.	But otherwise you consider yourself a	16	·
17	-	e, safe driver?	17	,
18	.cr, rerrant	MR. ZHU: Objection. Asked and	18	,
19	answered.	ric. 2110. Objection. Ablied did	19	
20	A.	Correct.	20	
21	Q.	Would you say you are very familiar	21	•
22	_	d areas in northern New Jersey?	22	-
23	A.	I am very familiar with the roads in	23	
24		and New Jersey.	24	•
25		· · · · · · · · · · · · · · · · · · ·	25	
25	Q.	Okay. How did you find out about the	23	A. ICS.
		Page 19		Page 2
1		uity at the Mission?	1	
2	Α.	I found out through HeyKorean. It's a	2	•
3	_	or portal. There was a job listing in	3	3
4	March of 201		4	•
5	Q.	Were you aware that the same job ad was	5	
6		ole on the website of the Mission?	6	
7	A.	I didn't know.	7	•••••••••••••••••••••••••••••••••••••••
8	Q.	Did you ever know that it was available	8	
9		te of the Mission?	9	
10	Α.	By 2020 when this case was already	10	.
11		w about it. So as I asked my attorney	11	
12		ly went to the website of the Mission to	12	Q. Was it ever mentioned afterwards?
13	see if there	e were such listings available on the home	13	A. Yes, the first day of my job when I
14	page.		14	
15	Q.	Now, how did you reach out to the	15	
16		a job interview? Did you call them? Did	16	
17	you email th		17	confidential, however, when I asked them what type of
18	A.	I followed the instructions of the	18	
19	posting in c	or on HeyKorean.	19	organization was.
20	Q.	What were the instructions?	20	Q. Okay. Now, we're going to get there.
	A.	Based on my recollection, I believe I	21	Who offered you a job? You can just tell me the last
21		l to contact via email.	22	name of the person.
	was supposed	t to contact via chair.		
21	was supposed	What was the position and title you	23	A. Mr. Jo was the one who notified me.
21 22		What was the position and title you	23 24	

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 22..25

				_
1	Q.	Page 22 Okay. You accepted that offer?	1	$oldsymbol{ ext{Page}}$ A. Well, it's a pledge agreement that I
2	Α.	Yes.	2	
3		MR. LIM: Okay. I'm going to mark D-1.	3	
4	These are the		4	- · ·
5	111000 010 011	(Defendant's Exhibit 1, 2016 contract	5	
6	and to	ranslation, was marked for	6	•
7		ification.)	7	
8	identi	(Discussion off the record.)	8	
	0	,	9	
9	Q.	All right. Mr. Nam, we just handed to	-	
10		een marked as D-1. We're going to spend	10	
11		e identifying the documents that have	11	
12	been marked a		12	
13		Now, do you recognize these documents,	13	•
14	sir?		14	• '
15	Α.	Yes.	15	
16	Q.	What is this?	16	
17	Α.	It's an employment contract for	17	•• •
18	chauffeur.		18	
19	Q.	Now, let's go to the last page of the	19	
20	contract. Do	you see that no, that's different,	20	~
21	second to the	e last.	21	
22		Now, that's the last page of the	22	Q. You did not even understand?
23	employment co	ontract for chauffeur?	23	MR. ZHU: Objection. Asked and
24	A.	Yes.	24	answered.
25	Q.	Do you see your signature there?	25	Q. Go ahead.
		Page 23		Page
1	A.	Yes.	1	A. Typically as an employee I had to agre
2	Q.	You signed it?	2	with all the terms that was presented to me, so I have
3	A.	Yes.	3	to sign.
4	Q.	You signed it voluntarily?	4	Q. Okay. Did you ever read this contract
5	A.	Yes.	5	afterwards?
6	Q.	No one forced you to sign it, correct?	6	A. Yes, once.
7	A.	Correct.	7	Q. Okay. You read it?
8	Q.	At the time you signed it, you had	8	MR. ZHU: Objection. Asked and
9	every intenti	ion to abide by the terms of this	9	answered.
10	contract, con	rrect?	10	A. Yes.
11		MR. ZHU: Objection. Calls for a legal	11	MR. LIM: Just put your objection on
12	conclusion.		12	the record. I don't want you to violate the rule.
13		You can answer, if you understand.	13	Just say objection to the form. That's all you need
14		MR. LIM: So, okay, counsel, just	14	
15	objection to	the form as the rule requires. I don't	15	MR. ZHU: No, I have an objection.
16	want you to	just speak.	16	Asked and answered. If you want, we can call judge
17	Α.	Correct.	17	
18	Q.	Okay. Now, you understand that when	18	objection I can put on the record.
19	_	, you had a contractual duty and	19	-
20	-	abide by the terms, correct?	20	
21	A.	Correct.	21	
22	Q.	Let's go to the next page. Do you	22	, •
23	recognize that		23	
24	A.	Yes.	24	-
25	Q.	Do you know what that is?	25	
	ו			x s cimi circo paragrapio,

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 26..29

		Tryumuy Nan	· •	
1	right?	Page 26	1	Page 28 Do you see that, sir?
2	A.	Correct.	2	A. Yes.
3	Q.	Did you read it?	3	Q. Do you see your signature there?
4	2.	MR. ZHU: Objection. Asked and	4	A. Yes.
5	answered.	Tat. Miles objection. Tabled did	5	Q. You signed it, correct?
6	dibwered.	MR. LIM: Sir, hold on. Go off the	6	A. Yes.
7	record.	MR. HIM. SII, HOIQ OII. GO OII GIE	7	Q. And it was also signed by the minister
8	record.	(Discussion off the record.)	8	at the time, correct?
9		MR. LIM: Go ahead.	9	•
		THE INTERPRETER: What was the last		A. Can I explain to you the situations at the time of the signing?
10		THE INTERPRETER: WHAT WAS THE TAST	10	3 3
11	question?	/ml	11	Q. Sir, this is how it works, I'm asking
12	_	(The record was read.)	12	you questions. If you want to say something more,
13	Α.	Not at the time of signing.	13	then later you can always go through your counsel.
14	Q.	But did you read it later on?	14	Okay? You are here to answer my questions.
15	A.	No, I did not read this particular	15	A. Understood.
16		n after I signed.	16	Q. This contract is written in Korean,
17	Q.	I see. You never read this pledge	17	correct?
18	agreement?		18	A. Correct.
19		MR. ZHU: Objection. Asked and	19	Q. When was the first time you read this?
20	answered.		20	A. No, after I signed it, I brought the
21	A.	I'm talking about at the time.	21	copy with me. Now, I didn't get the copy at the time
22	Q.	I see. But when did you read it?	22	of signing this document. So once I signed it, a few
23	A.	After the lawsuit started with my	23	days later I got a copy. So when I read the copy, I
24	attorney I re	ead it.	24	didn't read the entire content, but I read what I
25	Q.	Okay. Let's go to the next exhibit.	25	wanted to read which was how much I was getting paid.
		Page 27		Page 29
1		- 191 -	1	Q. Okay. But you had an opportunity to
2	(REQ)	MR. ZHU: For the record, we call for	2	read the whole contract?
3	production of	ROKPM 00010-T through 13-T as well	3	MR. ZHU: Objection to the form.
4	certificate o	of translation.	4	A. I didn't, not at the time of the
5		(Discussion off the record.)	5	signing.
6		(Defendant's Exhibit 2, 2017 papers	6	Q. Are you saying that by the way, who
7	with t	translation, was marked for	7	presented this contract to you in 2016 and '17? Just
8	ident:	lfication.)	8	the last name, please.
9	Q.	All right. Now, what's been handed to	9	A. It was Mr. Jo.
10		it D-2. I want you to go through that	10	Q. 2016 and 2017 both contracts were
11	and identify	• • •	11	presented by Mr. Jo?
12	A.	This is an unfair employment contract	12	A. Based on my recollection, I believe in
13		It's asking me to comply with whatever	13	2016 it was Mr. Jo so, in 2017 I believe it was
14		ment conditions are under the employment	14	Mr. Lee. I was mistaken. However no, now that he
15	contract.		15	know about it, I believe in 2017 it was also Mr. Jo.
16	Q.	Mr. Nam, I just want you to listen to	16	I thought it was between 2016 and 2017 there was a
17	-	carefully. You're not here to give your	17	personnel change but I was wrong.
18		Just answer my questions. I just asked	18	Q. Okay. So let's clarify the record,
19		this? Isn't this an employment contract?	19	okay. So both contracts, the 2016 and 2017 which we
20	You what is t	Yes.	20	just reviewed, were both presented by Mr. Jo to you,
1 4U				
	Q.	That's the one that you're signed in	21 22	correct?
21	2017		. , ,	
21 22	2017, correct			A. Yes, Mr. Jo.
21 22 23	Α.	Correct.	23	Q. Okay. Again, these two contracts bear
21 22	A. Q.			

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 30..33

	11yumluy Ivai	0	1 ages 5053
1	Page 30 Q. Now, are you saying that in both 2016	1	Page 32 A. Yes.
2	and '17 after you signed it, you got a copy of both	2	Q. And starting from July 1, 2018?
3	contracts a few days later?	3	MR. ZHU: Objection. No question
4	A. Yes.	4	pending.
5	Q. Okay. And you were able to retain a	5	Q. Correct?
6	copy of the fully executed contracts?	6	A. Yes.
7	MR. ZHU: Objection. No question	7	Q. And ends on June 30, 2019; is that
8	pending. He already answered.	8	correct?
9	A. Correct.	9	A. Yes.
10	Q. In fact, you did retain the copies of	10	Q. Now, let's go to the last page of
11	the 2016 and 2017 contract in your possession,	11	employment contract for chauffeur, Bates stamp No.
12	correct?	12	23. Do you see a date there?
13	A. Correct.	13	A. Yes.
14	Q. Now, let's go to the pledge agreement	14	Q. July 1, 2018?
15	Bates stamp No. 19. I see a date July 1, 2017, and	15	A. Yes.
16	did you print your name?	16	Q. That's your signature, correct?
17	A. Yes.	17	A. Well, the contract was presented to me
18	Q. Okay. And it only contains two	18	not on July 1st but it was actually presented to me
19	paragraphs. Did you sign this after you read it?	19	about 20 days later. So in or around July 20th was
20	A. I didn't.	20	when I signed the contract.
21	Q. You didn't even read it?	21	Q. I understand. But that's your
22	A. Because I was instructed to just sign	22	signature here?
23	without reading it.	23	A. Yes.
24	Q. Are you saying that Mr. Jo just forced	24	Q. You signed it voluntarily?
25	you to sign it?	25	A. Yes.
	Page 31		Page 33
1	A. Well, I mean, he did not force me,	1	Q. Okay. Now, are you saying that you got
2	however, typically in order for me to work there, I	2	a signed copy of this contract a few days after you
3	had to sign a document like this. So when these	3	had signed it?
4	types of documents are presented to me, I had to	4	A. Yes.
5	sign.	5	Q. You were able to retain it?
6	Q. When you signed 2016-'17 employment	6	A. Yes.
7	contract and pledge agreements, did Mr. Jo ever force	7	Q. You've been keeping it, correct?
8	you, coerce you, threaten you into signing these	8	A. Yes.
9	documents?	9	Q. Now, it's written in Korean, correct?
10 11	A. No. Q. Let's go to next, Bates stamp No. 20.	10 11	A. Yes. Q. Okay. Did you read it at any time?
12		12	
13	(Defendant's Exhibit 3, 2018 papers with translation, was marked for	13	A. Well, typically the minister signs it on a later date. So once I received a copy, I read
14	identification.)	14	what I wanted to read with regard to the pay and then
15	Q. Okay. We're going to go through the	15	I kept the document.
16	same drill. Okay? Do you recognize these documents,	16	Q. Up until this point did anybody
17	sir?	17	strike that.
18	A. Yes.	18	When Mr. Jo presented 2016 and 2017
19	Q. This is an employment contract for	19	contracts, or whoever presented 2018 contract to you,
20	2018?	20	did they not want you to read this contract?
21	A. Yes.	21	MR. ZHU: Objection. Foundation.
22	MR. ZHU: Objection. No question	22	A. No.
23	pending.	23	Q. Okay. You signed it because you knew
24	Q. Okay. Now, this is an employment	24	that in order to have a job at the Mission, you had
25	contract also was a one-year term?	25	to sign this contract, is that what you're saying?
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HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 34..37

1 A. Yes. 2 Q. Who presented this contract, 2018 3 contract to you? Is that Mr. Jo or someone else this 4 time? 5 A. I believe it was Mr. Lee. 6 Q. Okay. Did Mr. Jo and Mr. Lee go over 7 every line in the contract before you signed it? 8 MR. ZHU: Objection to form. 9 A. No. 10 Q. Let's go to pledge agreement, Bates 11 stamp No. 24. Do you see that, sir? 11 stamp No. 24. Do you see that, sir? 12 A. Yes. 13 Q. That's your signature? 14 A. Yes. 15 Q. Did you sign it at the same time that 16 you signed the employment contract for chauffeur? 17 A. Well, I can't recall with this 18 particular document, however, there were times when 19 the two documents were brought together and other 20 times they were not. 21 Q. So I'm asking you, do you recall 22 whether or not you signed this particular document, 23 Bates No. 24, at the time that you signed the 24 employment contract for chauffeur? 25 MR. ZHU: Objection. Asked and		Hyunnuy Nai	11 011	102/22/2022 Pages 3437
Q. Mos presented this contract, 2018 3 contract to you? If that Mr. No or someone else this 4 time? 5 A. 1 believe it was Mr. Lee. 9 Q. Okay. Did Mr. Jo and Mr. Lee go over 7 every line in the contract before you signed it? 8 MR. 250: Objection to form. 9 A. Bo. 10 Q. Let's go to pledge agreement, Bates 11 stamp No. 24. Do you see that, sir? 11 stamp No. 24. Do you see that, sir? 12 A. Yes. 13 Q. That's your signature? 14 A. Yes. 15 Q. Did you sign it at the same time that 16 you signed the employment contract for chauffeur? 17 A. Well, I can't recall with this 18 perticular document, however, there were times when 19 the two documents were hrought topschive and other 10 times they were not. 11 stamp No. 24. Do you gigned this particular document. 12 whether or not you signed this particular document 13 stamp No. 25, at the time that you signed the 14 employment contract for chauffeur? 15 NR. 250: Objection. Asked and 16 you signed the semployment contract for chauffeur? 17 A. Well, I can you just translate my 18 objection as well? 19 on Now, Jet's go through the rest of the 10 on Now, Jet's go through the rest of the 11 dirting you know. 12 NR. 150: Well, she's doing it. 13 Q. Okay. 14 NR. 150: Well, she's doing it. 15 Q. Now, you see this employment contract 16 for chauffeur stokes No. 25? 17 A. Yes. 18 Q. Okay. You've seen this document 19 before? 20 A. Yes. 21 Q. No Now, You've seen this document 21 D. Okay. You've seen this document 22 A. Yes. 23 Yes. 24 A. Yes. 25 NR. 150: Well, she's doing it. 26 Q. Now, you see this semployment contract 27 Q. Okay. Now, let's go to a document 28 the date that you signed it? 29 A. Yes. 20 Q. Now, well is go to he hast pego of the document Sakes stamp No. 25, it appears and the well will be first provided the sicher hereemen to to 20 document. 29 A. Yes. 20 Q. Now, you see that, shift of the document Sakes stamp No. 25, it appears and the shift of the document Sakes stamp No. 25, it appears and the shift of the document Sakes stamp No. 25, it appears and the shift of the	1	9		Page 36
detailed to you? Is that Mr. Jo or someone else this time? A. 1 believe it was Mr. Lee. O. O'Nay. Did Mr. Jo and Mr. Lee go over every line in the contract before you signed it? NR. ZEU: Objection to form. A. No. LINE SMR. The line in the contract before you signed it? NR. LINE SMR. LINE Smr. A. No. LAR Yes. D. Lat's go to pledge agreement, Bates If stamp No. 24. Do you see that, sir? A. Yes. D. Did you sign it at the same time that you signed the employment contract for chauffeur? A. Yes. D. Did you sign it at the same time that you signed comment, heaver, there were times when the the state bringing me this document. However, there were times when the documents, it would be either betowen 10 to 20 days late. The two documents were brought together and other times they were not. A. So. The anking you, do you recall the this they were not. A. So. The anking you, do you recall the employment contract for chauffeur? A. No. All the same time that you signed the employment contract for chauffeur? A. No. All the same time that you signed the employment contract for chauffeur? A. No. All the same time that you signed the employment contract for chauffeur? A. No. All the same time that you signed the employment contract for chauffeur? A. Wes. Page 35 A. No. All the same bringing me this document. However, there were times when the choice she bringing me this document. However, typically if it was other people who brought me the documents, it would be either between 10 to 20 days late. The three documents, it would be either between 10 to 20 days late. A. Yes. Page 35 A. Yes. Page 35 A. Yes. Page 35 A. Yes. O. Okay. All the state of the contract for chauffeur? A. H. LINE She is doing it. Just specified the salways has a one-year term, correct? A. Yes. D. Okay. In fact, you signed the rest of the string port in the document. Bates stamp No. 30. The same now, can you signed the employment contract, and the same pledge agreement that we have seem since 2016; is that correct? A. Yes				
4 time? 5 A. I believe it was Mr. Lee. 6 Q. Okay. Did Mr. Jo and Mr. Lee go over 7 every line in the contract before you signed it? 8 Me. ZHU: Objection to form. 9 A. No. 10 Q. Let's go to pledge agreement, Bates 11 stamp No. 24. Do you see that, sir? 12 A. Yes. 13 Q. That's your signature? 14 A. Yes. 15 Q. Did you sign it at the same time that 16 you signed the employment contract for chauffeur? 17 A. Well. I com't recoll with this 18 particular document, however, there were times when 19 the two documents were broospht together and other 20 times they were not. 21 Q. So Te asking you, do you recall 22 whether on to you signed this particular document, 23 Bates No. 24, at the time that you signed the 24 employment contract for chauffeur? 25 Me. ZHU: Objection. Asked and 26 Me. LIN: She is doing it. 3 Q. Okay. 4 Me. ZHU: Can you just translate my 5 objection as well? 2 A. I don't remember. 3 Q. Okay. 4 Me. ZHU: Can you just translate my 5 objection as well? 6 Me. LIN: She is doing it. 7 Me. ZHU: Can you just translate my 6 chieffedant's Enhibit P. 4, 2019 speers and 14 translation, was marked for identification. 15 Q. Now, Jet's go through the rest of the 16 drill. Let's go to the next employment contract. 17 A. Yes. 18 Q. Okay. You've seen this document 19 before? 20 A. Yes. 21 Q. Now, Yes eseen this document 22 A. Yes. 23 Q. Okay. 4 Me. ZHU: Gan you just translate my 5 objection as well? 6 Now, Just's go through the rest of the 11 drill. Let's go to the next employment contract. 18 Q. Okay. Now, let's go through the rest of the 11 drill. Let's go to the next employment contract. 21 Q. Now, Yes. 22 A. Yes. 23 Q. Okay. 24 A. Yes. 25 Now, Okay. You've seen this document 26 Little manufacture, as marked for identification. 27 Q. Okay. In fact, you signed this pledge 28 please stamp No. 25, It was been contract, gates stamp No. 29. Is that 29 letting you know. 20 Q. Okay. The manufact for chauffeur? 21 A. Yes. 22 Q. Now, Just's go through the rest of the 23 Q. Okay. In fact, you signed this pledge 24 A. Yes. 25 N				
5 A. I believe it was Mr. Lee. 6 Q. Okay, Did Mr. Jo and Mr. Lee go over 7 every line in the contract before you signed it? 8 NR. ZHU: Objection to form. 9 A. No. 10 Q. Let's go to pledge agreement, Bates 11 stamp No. 24. Do you see that, sir? 11 A. Yes. 12 A. Yes. 13 Q. That's your signature? 14 A. Yes. 15 Q. Did you sign it at the same time that 16 you signed the employment contract for chauffeur? 17 A. Well, I can't recall with this 18 particular document, chauser, there were times when 19 the two documents were brought together and other 10 the two documents were brought together and other 11 dims they were not. 12 whether or not you signed this particular document, 13 answered. 14 answered. 15 Q. Okay. 16 NR. ZHU: Objection. Asked and 17 AR. ZHU: Objection. Asked and 18 chapter of the document as a con-year term? 19 before on the contract for chauffeur? 20 times they were not. 21 A. Yes. 22 A. I don't remember. 23 Bates No. 24, at the time that you signed the employment contract for chauffeur? 24 answered. 25 NR. ZHU: Objection. Asked and 26 NR. ZHU: Objection. Asked and 27 A. Yes. 28 LIN: She is doing it. 29 A. Yes. 21 Q. Okay. Now, let's go to a document. 21 A. Yes. 22 A. Yes. 23 A. Correct. 24 A. Yes. 25 O. Now, one pledge agreement that that translation, was marked for identification. 1, 4 O. Okay. Now, let's go to a document. 29 A. Yes. 20 Okay. This is the same pledge agreement that translation, was marked for identification. 1, 4 O. Okay. In fact, you signed this pledge agreement that translation, was marked for identification. 1, 4 O. Okay. In fact, you signed this pledge agreement that translation, was marked for identification. 1, 4 O. Okay. In fact, you signed this pledge agreement that translation, was marked for identification. 1, 4 O. Okay. In fact, you signed this pledge agreement that translation, was marked for identification. 1, 4 O. Okay. In fact, you signed this pledge agreement that the fact of the data lists that same pledge agreement that translation, was marked for identification. 1				
6 Q. Okay. Did Mr. Jo and Mr. Lee go over 7 every line in the contract before you signed it? 8 No. 24. No. 25. A. No. 27. A. No. 27. A. Now, when the clarify something, please? 9 A. No. 26. Let's go to pledge agreement, Bates 11 stamp No. 24. Do you see that, sir? 12. A. Yes. 13. Q. That's your signature? 14. A. Yes. 15. Q. Did you sign it at the same time that 16. You signed the employment contract for chauffeur? 17. A. Well, I can't recall with this 18. particular document, however, there were times when 18. The work of the the two documents were brought together and other 19. You signed this particular document, however, there were times when 19. The two documents were brought together and other 20. You signed this particular document, however, there were times when 20. You signed this particular document, however, there were times when 20. You signed this particular document, however, there were times when 20. You signed this particular document, however not. 20. So I'm asking you, do you recall 21. Whether or not you signed this particular document, 22. Whether or not you signed this particular document, 23. The same of the contract for chauffeur? 24. A. I don't remember. 25. NR. ZHE: Can you just translate my 25. Okay. And so far of the contracts that 27. NR. ZHE: Can you just translate my 25. Okay. Now, let's go through the rest of the 11. drill, Let's go to the next employment contract. 15. Q. Now, you seement hat the same this document at the same shelployment contract. 16. Okay. Now, let's go through the rest of the 11. drill, Let's go to the next employment contract. 17. Now, 18. Now,				
2 New York Pine in the contract before you signed it? New York Pine In the contract for chauffeur? New York Pine Pine Pine Pine Pine Pine Pine Pine				
8				
9 A. No. While Mr. Hyun Cho, the investor 10 was at the Mission — 11 was at the Mission — 11 MR. NNAW: The minister. 12 A. Yes. 12 A. Now, when Mr. Cho was working at the Mission and when Mr. Choi was bringing me this document. 13 Mission and when Mr. Choi was bringing me this document to sign, he would usually brihe prior to the date listed at the last page of the document. 16 particular document, however, there were times when 19 the two documents, however, there were times when 19 the two document, however, there were times when 19 the two documents, however, there were times when 19 the two document, however, there were times when 19 the two documents, however, there were times when 19 the two documents, however, there were times when 19 the two documents, however, there were times when 19 the two documents, however, there were times when 19 the two documents, however, there were times when 19 the two documents, however, there were times when 19 the two documents, however, there were times when 19 the two documents, however, there were times when 19 the two documents, however, there were times when 19 the two documents, however, there were times when 19 the two documents, however, there were times when 19 the two documents, however, there were times when 19 the two documents, however, there were times when 19 the two documents, however, there were times when 19 the two documents, and the was a time Mr. Choi was bringing at the document 10 to the date listed at the last page of the document 10 to the date listed at the last page of the document 10 to the date listed at the last page of the document 10 to the date listed at the last page of the document 10 to the date listed at the last page of the document 10 to the date listed at the last page of the document 10 to the date listed at the last page of the document 10 to the date listed at the last page of the document 10 to the date listed at the last page of the document 10 to the date listed at the last page of the document 10 to the date listed at the las				
10		·		
11 stamp No. 24. Do you see that, sir? 12 A. Yes. 13 Q. That's your signature? 14 A. Yes. 15 Q. Did you sign it at the same time that 16 you signed the employment contract for chauffeur? 17 A. Well, I can't recall with this 18 particular document, however, there were times when 19 the two documents were brought together and other 20 times they were not. 21 Q. So I'm asking you, do you recall 22 whether or not you signed this particular document, 23 Rates No. 24, at the time that you signed the employment contract for chauffeur? 24 employment contract for chauffeur? 25 MR. 2HU: Objection. Asked and 26 A. Yes. 27 Q. Okay. I understand that. Now, let's go to before that. And this document you signed, 28 the sen. 24, at the time that you signed the employment contract for chauffeur? 29 the contract for chauffeur? 20 MR. 2HU: Objection. Asked and 21 answered. 22 A. I don't remember. 33 Q. Okay. 4 MR. 2HU: Objection. Asked and 4 MR. 2HU: Mell, she's doing it. 4 MR. 2HU: Mell, she's doing it. 5 chauffeur has always has a one-year term, correct? 4 A. Yes. 6 A. Yes. 7 Q. Okay. Now, let's go through the rest of the 11 drill. Let's go to the next employment contract. 12 MR. KNEK: Warking it as bablibit D-4. 13 (Defendant's Schibit 4, 2019 papers and 14 translation, was marked for identification.) 14 (Defendant's Schibit 4, 2019 papers and 14 translation, was marked for identification.) 15 Q. Now, let's go through the rest of the 11 drill. Let's go to the next employment contract. 12 MR. KNEK: Warking it as sabdibit D-4. 13 Q. Okay. You've seen this document 14 Correct. 15 A. Yes. 16 A. Yes. 17 A. Yes. 18 Q. Okay. You've seen this document 19 before? 20 A. Yes. 21 Q. In fact, let's go to the last page of 21 A. Yes. 22 A. Yes. 23 Now, do you recognize this document, 24 A. Yes. 25 Q. Okay. In fact, you signed this pledge agreement that we have seen since 2016; is that correct? 20 A. Yes. 21 Q. In fact, let's go to the last page of 21 A. Yes. 22 Now, do you recognize this document, 23 Now, do you recognize this document, 2				· • • • • • • • • • • • • • • • • • • •
12 A. Now, when Mr. Cho was working at the 13 A. Yes. 15 Q. Did you signature? 16 you signed the employment contract for chauffeur? 17 A. Well, I can't recall with this 18 particular document, however, there were times when 19 the two documents were brought together and other 21 times they were not. 22 whether or not you signed this particular document, 23 Bates No. 24, at the time that you signed the 24 employment contract for chauffeur? 25 MR. ZHU: Chipection. Asked and 26 MR. ZHU: Chipection. Asked and 27 answered. 28 A. Now, when Mr. Cho was working at the 29 Mission and when Mr. Cho was beringing me this 29 to the date listed at the last page of the document. 20 May, I understant that. Now, let's 29 to before that. And this document you signed, 21 I'm referring to the document sates stamp No. 25, it 22 appears that this contract began on July 1, 2019, 23 though, correct, and it was a one-year term; 24 A. Yes. 25 We have reviewed, the employment contract for 25 chauffeur has always has a one-year term, correct? 26 A. Yes. 27 Q. Okay. Tunderstand that. Now, let's go 28 Yes. 28 Q. Okay. And so far of the contracts that 29 the first of this document always has a one-year term, correct? 3 A. Correct. 4 Q. So you signed an employment contract 5 every year? 5 we have reviewed, the employment contract for 2 chauffeur has always has a one-year term, correct? 3 A. Correct. 4 Q. So you signed an employment contract 4 Q. Okay. Now, let's go to the next employment contract 5 every year? 6 A. Yes. 6 A. Yes. 6 A. Yes. 7 Q. Okay. Tunderstand Korean. 8 MR. ZHU: I don't understand Korean. 9 Letting you know. 10 Q. Now, let's go through the rest of the 11 drill. Let's go to the next employment contract 11 Q. Now, you see this employment contract 12 A. Correct. 13 Q. Okay. You've seen this document 14 translation, was marked for identification.) 15 Q. Now, you see this employment contract 16 for chauffeur Bates No. 25? 17 A. Yes. 18 Q. Okay. You've seen this document 19 before? 20 A. Yes. 21 Q. In fact, let's go to the las				
13 Q. That's your signature? 14 A. Yes. 15 Q. Did you sign it at the same time that 16 you signed the employment contract for chauffeur? 17 A. Well, I can't recall with this 18 particular document, however, there were times when 19 the two documents were brought together and other 19 times they were not. 21 Q. So I'm asking you, do you recall 22 whether or not you signed this particular document, 23 Bates No. 24, at the time that you signed the 24 employment contract for chauffeur? 25 MR. ZHU: Objection. Asked and 26 A. I don't remember: 27 answered. 28 A. I don't remember: 39 Q. Okay. 40 MR. ZHU: Can you just translate my 41 dojection as well? 41 Mission and when Mr. Choi was bringing me this 41 documents to sign, he would usually bring them prior 42 to the date listed at the last page of the document. 43 However, typically if it was other page of the document. 44 documents that that you signed the 45 go to before that. And this document you signed, 41 "re referring to the document attest stamp No. 25, it 42 answered. 43 answered. 44 employment contract for chauffeur? 45 documents to sign, he would usually bring them prior 46 the date listed at the last page of the document. 46 Mooveer, typically if it was other page of the document. 47 The two documents are the would usually bring them prior 48 to the date listed at the last page of the document. 49 doys late. 40 Q. Kay. I understand that. Now, let's 40 go to before that. And this document pages of the document. 42 A. Yes. 42 A. Yes. 43 A. Yes. 44 Ease Navy. And so far of the contracts that 45 Q. Okay. And so far of the contracts for chauffeur has always has a one-year term? 4 Q. So you signed an employment contract 4 Q. So you signed an employment contract 5 every year? 5 A. Yes. 6 A. Yes. 9 Q. Okay. Now, let's go to a document 8 Bates stamp No. 30. The same now, can you identify that for me? 10 Q. Now, you see this employment contract 11 Q. May is the same pledge agreement that 12 We have seen since 2016; is that correct? 13 A. Correct. 14 Q. And t				
14 A. Yes. Q. Did you sign it at the same time that by ou signed the employment contract for chauffeur? A. Well, I can't recall with this particular document, however, there were times when the two documents were brought together and other to times they were not. Q. So I'm asking you, do you recall whether or not you signed this particular document, asked and temployment contract for chauffeur? A. I don't remember. A. Occreet. A. Correct. A. Correct. A. Yes. Q. Now, let's go through the rest of the tird till. Let's go to the next employment contract. MR. KIM: Well, she's doing it. Q. Now, let's go through the rest of the tird till. Let's go to the next employment contract. MR. KIM: Well, she's doing it. Q. Now, you see this employment contract. MR. KIM: Well as Exhibit D-4. (Defendant's Exhibit 4, 2019 papers and translation, was marked for identification.) Q. Now, you see this employment contract. A. Yes. Q. Okay. You've seen this document A. Yes. Q. In fact, let's go to the last page of the employment contract, Bates stamp No. 29. Is that your signature, sir? A. Yes. A. I don't merember. A. Yes. A. Ye				,
15 you signed the employment contract for chauffeur? A. Well, I can't recall with this 18 particular document, however, there were times when 19 the two documents were brought together and other 20 times they were not. 21 Q. So I'm asking you, do you recall 22 whether or not you signed this particular document, 23 Bates No. 24, at the time that you signed the 24 employment contract for chauffeur? 25 MR. ZHU: Chjection. Asked and 26 Page 35 1 answered. 27 Q. Okay. 28 RR. ZHU: Can you just translate my 29 objection as well? 3 Q. Okay. 4 MR. ZHU: I don't understand Korean. 3 MR. ZHU: I don't understand Korean. 4 MR. LIM: She is doing it. 5 objection as well? 6 MR. LIM: She is doing it. 7 MR. ZHU: Mell, she's doing it. 9 Letting you know. 10 Q. Now, let's go through the rest of the 11 drill. Let's go to the next employment contract. 12 MR. KNAK: Marking it as Exhibit D-4. 13 (Defendant's Exhibit 4, 2019 papers and translation, was marked for identification.) 14 (Defendant's Exhibit 4, 2019 papers and translation, was marked for identification.) 15 Q. Now, you see this employment contract. 16 A. Yes. 17 A. Yes. 18 Q. Okay. You've seen this document 19 before? 20 A. Yes. 21 Q. In fact, let's go to the last page of the documents, and this document, and this document, and this contract began on July 1, 2019, though, correct, and it was a one-year term? 24 A. Yes. 25 Q. Okay. And so far of the contracts that 26 Vehave reviewed, the employment contract for chauffeur has always has a one-year term? 27 A. Orrect. 28 Q. Okay. Now, let's go to a document 29 A. Yes. 10 A. Pledge agreement. 11 drill. Let's go to the next employment contract. 12 Q. All right. Now, let's go to a document 13 A. Correct. 4 Q. Okay. Th fact, you signed this pledge 29 agreement every year as well? A. Correct. Q. And that's your signature, correct? A. Yes. 10 Q. All right. Now, let's go to next 11 me the documents, it would be either between 10 to 20 20 A. Yes. 21 Q. In fact, let's go to the last p		• •		
16 you signed the employment contract for chauffeur? 17				
17 A. Well, I can't recall with this 18 particular document, however, there were times when 19 the two documents were brought together and other 20 times they were not. 21 Q. So I'm asking you, do you recall 22 whether or not you signed this particular document, 23 Bates No. 24, at the time that you signed the 24 employment contract for chauffeur? 25 MR. ZHU: Objection. Asked and 26 A. I don't remember. 27 A. I don't remember. 28 A. I don't remember. 29 A. I don't remember. 30 Q. Okay. 40 MR. ZHU: Can you just translate my 40 objection as well? 41 MR. LIM: She is doing it. 41 MR. LIM: She is doing it. 42 MR. LIM: Well, she's doing it. 43 Q. Now, let's go through the rest of the 44 drill. Let's go to the next employment contract. 45 MR. KNAK: Marking it as Exhibit D-4. 46 Correct. 47 MR. KNAK: Marking it as Exhibit D-4. 48 Correct. 49 MR. SHORE Marking it as Exhibit D-4. 40 (Defendant's Exhibit 4, 2019 papers and translation, was marked for identification.) 40 MR. KNAK: Marking it as Exhibit D-4. 41 Correct. 40 MR. KNAK: Marking it as Exhibit D-4. 41 Correct. 41 MR. KNAK: Marking it as Exhibit D-4. 42 MR. KNAK: Marking it as Exhibit D-4. 43 MR. KNAK: Marking it as Exhibit D-4. 44 MR. KNAK: Marking it as Exhibit D-4. 45 MR. LIM: Well, she's doing it. 46 MR. LIM: Well, she's doing it. 47 MR. KNAK: Marking it as Exhibit D-4. 48 MR. KNAK: Marking it as Exhibit D-4. 49 MR. KNAK: Marking it as Exhibit D-4. 40 MR. KNAK: Marking it as Exhibit D-4. 41 MR. KNAK: Marking it as Exhibit D-4. 42 MR. KNAK: Marking it as Exhibit D-4. 43 MR. KNAK: Marking it as Exhibit D-4. 44 MR. KNAK: Marking it as Exhibit D-4. 45 MR. KNAK: Marking it as Exhibit D-4. 46 MR. LIM: She is doing it. 47 MR. LIM: She is doing it. 48 MR. LIM: She is doing it. 49 MR. LIM: She is doing it. 40 MR. LIM: She is doing it. 41 MR. LIM: She is doing it. 42 MR. Yes. 41 MR. LIM: She is doing it. 43 MR. LIM: She is doing it. 44 MR. LIM: She is doing it. 45 MR. LIM: She is doing it. 46 MR. LIM: She is doing it. 47 MR. LIM: She is doing it. 48 MR. LIM: She is doin				2 0
page 35 answered. A. I don't remember. A. Yes. A. Yes. A. Yes. A. Yes. A. Yes. Q. Okay. Now, let's go through the rest of the document bates stamp No. 25, it appears that this contract began on July 1, 2019, though, correct, and it was a one-year term? A. Yes. Q. Okay. And so far of the contracts that the rewise of the contracts that the employment contract for chauffeur has always has a one-year term, correct? A. Yes. Q. Okay. Now, let's go through the rest of the document bates stamp No. 30. The same now, can you identify that for me? A. Pledge agreement. A. Pledge agreement that we have seen since 2016; is that correct? A. Correct. Q. Okay. I understand that. Now, let's po to appear that this document pour signed, 'I'm referring to the document Bates stamp No. 25, it appears that this contract began on July 1, 2019, though, correct, and it was a one-year term? A. Yes. Q. Okay. And so far of the contracts for chauffeur has a one-year term? A. Yes. Q. Okay. Now, let's go to a document bate stamp No. 30. The same now, can you identify that for me? A. Pledge agreement. Q. Okay. I mact, you signed this pledge agreement every year as well? A. Correct. Q. Okay. I mact, you signed this pledge agreement every year as well? A. Yes. Q. All right. Now, let's go to next employment contract, 31. I'm referring to employment contract, 31. I'm referring to employment contract, 31. Swo, do you recognize this document, 32. A. Yes.				
times they were not. Q. Okay. I understand that. Now, let's go to before that. And this document you signed, I'm referring to the document Bates stamp No. 25, it appears that this contract began on July 1, 2019, though, correct, and it was a one-year term? A. I don't remember. Q. Okay. MR. ZHU: Objection. Asked and Page 35 A. I don't remember. Q. Okay. MR. ZHU: Can you just translate my objection as well? MR. ZHU: I don't understand Korean. MR. ZHU: Mell, she's doing it. MR. ZHU: Mell, she's doing it. Q. Now, let's go through the rest of the drill. Let's go to the next employment contract. MR. KWAK: Marking it as Exhibit D-4. (Defendant's Exhibit 4, 2019 papers and translation, was marked for identification.) Q. Now, you see this employment contract MR. KWAK: Marking it as Exhibit D-4. MR. Wes. Q. Okay. You've seen this document MR. Yes. MR. Yes. Q. Okay. You've seen this document MR. Yes. MR. Wes. MR. ZHU: Can you just translate my objection as well? MR. ZHU: I don't understand Korean. MR. LIM: Well, she's doing it. MR. ZHU: I don't understand Korean. MR. LIM: Well, she's doing it. MR. ZHU: I don't understand Korean. MR. LIM: Well, she's doing it. MR. ZHU: I don't understand Korean. MR. LIM: Well, she's doing it. MR. ZHU: I don't understand Korean. MR. LIM: Well, she's doing it. MR. ZHU: I don't understand Korean. MR. LIM: She is doing it. MR. ZHU: I don't understand Korean. MR. LIM: She is doing it. MR. ZHU: Objection as well? MR. ZHU: Obj				
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Q. So I'm asking you, do you recall whether or not you signed this particular document, Bates No. 24, at the time that you signed the employment contract for chauffeur? MR. ZHU: Objection. Asked and Page 35 answered. A. I don't remember. Q. Okay. MR. ZHU: Can you just translate my objection as well? MR. LIM: She is doing it. MR. LIM: Well, she's doing it. Just letting you know. Q. Now, let's go through the rest of the firtil. Let's go to the next employment contract. (Defendant's Exhibit 4, 2019 papers and translation, was marked for identification.) Q. Now, you see this employment contract for chauffeur Bates No. 25, it appears that this contract began on July 1, 2019, though, correct, and it was a one-year term? A. Yes. Page 35 Page 35 we have reviewed, the employment contract for chauffeur has always has a one-year term, correct? chauffeur has always has a one-year term, correct? A. Yes. Q. So you signed an employment contract severy year? A. Yes. Q. Okay. Now, let's go to a document Bates stamp No. 30. The same now, can you identify that for me? A. Pledge agreement that we have seen since 2016; is that correct? A. Correct. Q. Okay. In fact, you signed this pledge agreement every year as well? A. Correct. Q. Okay. In fact, you signature, correct? A. Yes. Q. All right. Now, let's go to next employment contract, 31. I'm referring to employment contract for chauffeur, Bates stamp No. 31. Now, do you recognize this document, soir; A. Yes. A. Yes. A. Yes. A. Yes. A. Yes. A. Yes. Now, do you recognize this document, Samplar and the sate and it was a one-year term? A. Yes. A. Correct. Q. Okay. Now, let's go to a document A. Pledge agreement. A. Correct. Q. Okay. In fact, you signed this pledge agreement every year as well? A. Correct. A. Yes. A. Yes. Now, do you recognize this document, Samplar and the sates stamp No. 31. Now, do you recognize this document, Samplar and the sates stamp No. 31. Now, do you recognize this document, Samplar and the sates stamp No. 32.				•
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Bates No. 24, at the time that you signed the employment contract for chauffeur? 25				•
24 employment contract for chauffeur? 25 MR. ZHU: Objection. Asked and Page 35 1 answered. 2 A. I don't remember. 3 Q. Okay. 4 MR. ZHU: Can you just translate my 5 objection as well? 6 MR. LIM: She is doing it. 7 MR. LIM: She is doing it. 8 MR. LIM: Well, she's doing it. Just letting you know. 9 letting you know. 10 Q. Now, let's go through the rest of the lift. 11 drill. Let's go to the next employment contract. 12 MR. KWAK: Marking it as Exhibit D-4. 13 (Defendant's Exhibit 4, 2019 papers and translation, was marked for identification.) 15 Q. Now, you see this employment contract 16 for chauffeur Bates No. 25? 17 A. Yes. 18 Q. Okay. You've seen this document 19 before? 20 A. Yes. 24 A. Yes. 25 Q. Okay. And so far of the contracts that 26 Correct. 27 Chauffeur has always has a one-year term, correct? 28 A. Yes. 3 A. Correct. 4 Q. So you signed an employment contract 5 every year? 6 A. Yes. 7 Q. Okay. Now, let's go to a document 8 Bates stamp No. 30. The same now, can you 9 identify that for me? 10 Q. This is the same pledge agreement that 11 Q. This is the same pledge agreement that 12 we have seen since 2016; is that correct? 13 A. Correct. 14 Q. Okay. In fact, you signed this pledge 15 A. Correct. 16 A. Correct. 17 Q. And that's your signature, correct? 18 A. Yes. 19 Q. All right. Now, let's go to next 20 employment contract, 31. I'm referring to employment 21 contract for chauffeur, Bates stamp No. 31. 22 Now, do you recognize this document, 23 your signature, sir? 24 A. Yes.				
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2 A. I don't remember. 3 Q. Okay. 4 MR. ZHU: Can you just translate my 5 objection as well? 6 MR. LIM: She is doing it. 7 MR. ZHU: I don't understand Korean. 8 MR. LIM: Well, she's doing it. Just 9 letting you know. 9 letting you know. 10 Q. Now, let's go through the rest of the 11 drill. Let's go to the next employment contract. 12 MR. KWAK: Marking it as Exhibit D-4. 13 (Defendant's Exhibit 4, 2019 papers and translation, was marked for identification.) 14 translation, was marked for identification.) 15 Q. Now, you see this employment contract 16 for chauffeur Bates No. 25? 17 A. Yes. 18 Q. Okay. You've seen this document 19 before? 20 A. Yes. 21 Q. In fact, let's go to the last page of the employment contract, Bates stamp No. 29. Is that your signature, sir? 24 A. Yes. 22 chauffeur has always has a one-year term, correct? 4 Q. So you signed an employment contract 6 A. Yes. 7 Q. Okay. Now, let's go to a document 8 Bates stamp No. 30. The same now, can you 9 identify that for me? 10 A. Pledge agreement. 11 Q. This is the same pledge agreement that 12 we have seen since 2016; is that correct? 13 A. Correct. 14 Q. Okay. In fact, you signed this pledge agreement every year as well? 15 A. Correct. 17 Q. And that's your signature, correct? 18 A. Yes. 19 Q. All right. Now, let's go to next 19 Q. All right. Now, let's go to next 20 employment contract, 31. I'm referring to employment 21 contract for chauffeur, Bates stamp No. 31. 22 Now, do you recognize this document, 23 your signature, sir? 24 A. Yes.	1	-		Page 37
A. Correct. A. Correct. A. Yes. Okay. MR. ZHU: Can you just translate my before? Q. Now, you signed an employment contract A. Yes. A. Correct. Q. So you signed an employment contract Every year? A. Yes. A. Yes. A. Yes. A. Yes. A. Correct. A. Yes. A. Yes. A. Okay. Now, let's go to a document Bates stamp No. 30. The same now, can you identify that for me? D. Now, let's go through the rest of the drill. Let's go to the next employment contract. MR. KWAK: Marking it as Exhibit D-4. C. (Defendant's Exhibit 4, 2019 papers and translation, was marked for identification.) D. Now, you see this employment contract G. Now, you see this employment contract A. Correct. A. Pledge agreement. C. This is the same pledge agreement that we have seen since 2016; is that correct? A. Correct. A. Correct. A. Correct. A. Correct. A. Correct. A. Pes. D. Now, let's go to a document Bates stamp No. 30. The same now, can you identify that for me? D. This is the same pledge agreement that We have seen since 2016; is that correct? A. Correct.				
MR. ZHU: Can you just translate my bipection as well? MR. LIM: She is doing it. MR. LIM: Well, she's go to a document Bates stamp No. 30. The same now, can you identify that for me? A. Pledge agreement. LI Q. This is the same pledge agreement that we have seen since 2016; is that correct? A. Correct. Q. Okay. In fact, you signed this pledge agreement every year? A. Correct. A. Correct. A. Correct. A. Correct. A. Yes. Pedge agreement. A. Correct. A. Correct. A. Correct. A. Correct. A. Yes. Pedge agreement. A. Correct. A. Correct. A. Correct. A. Correct. A. Yes. Pedge agreement. A. Correct. A. Correct. A. Correct. A. Yes. Pedge agreement. A. Correct. A. Correct. A. Correct. A. Yes. Pedge agreement. A. Correct. A. Correct. A. Yes. Pedge agreement. A. Correct. A. Correct. A. Yes. Pedge agreement. A. Correct. A. Correct				
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8 MR. LIM: Well, she's doing it. Just 9 letting you know. 9 letting you know. 9 letting you know. 10 Q. Now, let's go through the rest of the 11 drill. Let's go to the next employment contract. 11 Q. This is the same pledge agreement that 12 MR. KWAK: Marking it as Exhibit D-4. 13 (Defendant's Exhibit 4, 2019 papers and 14 translation, was marked for identification.) 15 Q. Now, you see this employment contract 16 for chauffeur Bates No. 25? 17 A. Yes. 18 Q. Okay. You've seen this document 19 before? 10 A. Pledge agreement. 11 Q. This is the same pledge agreement that 12 we have seen since 2016; is that correct? 13 A. Correct. 14 Q. Okay. In fact, you signed this pledge 15 agreement every year as well? 16 A. Correct. 17 Q. And that's your signature, correct? 18 A. Yes. 19 Q. All right. Now, let's go to next 20 A. Yes. 20 employment contract, 31. I'm referring to employment 21 contract for chauffeur, Bates stamp No. 31. 22 Now, do you recognize this document, 23 your signature, sir? 24 A. Yes. 24 A. Yes.		· ·		
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13 (Defendant's Exhibit 4, 2019 papers and 13 A. Correct. 14 translation, was marked for identification.) 15 Q. Now, you see this employment contract 16 for chauffeur Bates No. 25? 17 A. Yes. 18 Q. Okay. You've seen this document 19 before? 19 Q. All right. Now, let's go to next 20 A. Yes. 20 In fact, let's go to the last page of 21 the employment contract, Bates stamp No. 29. Is that 22 your signature, sir? 24 A. Yes. 20 A. Yes. 21 Q. All right. Now, let's go to next 22 contract for chauffeur, Bates stamp No. 31. 23 your signature, sir? 24 A. Yes. 26 A. Yes. 27 A. Yes. 28 A. Yes.				
translation, was marked for identification.) Q. Now, you see this employment contract for chauffeur Bates No. 25? A. Yes. Q. Okay. You've seen this document Perform A. Yes. Perform A. Yes. In fact, you signed this pledge A. Correct. A. Yes. Perform A.		•		
15 Q. Now, you see this employment contract 16 for chauffeur Bates No. 25? 17 A. Yes. 18 Q. Okay. You've seen this document 18 A. Yes. 19 before? 19 Q. All right. Now, let's go to next 20 A. Yes. 20 In fact, let's go to the last page of 21 contract, 31. I'm referring to employment 22 the employment contract, Bates stamp No. 29. Is that 23 your signature, sir? 24 A. Yes. 25 A. Yes. 26 A. Yes. 27 A. Yes. 28 A. Yes. 29 A. Yes. 20 And that's your signature, correct? 29 Q. All right. Now, let's go to next 20 contract, 31. I'm referring to employment 21 contract for chauffeur, Bates stamp No. 31. 22 the employment contract, Bates stamp No. 29. Is that 23 sir? 24 A. Yes.				
16 for chauffeur Bates No. 25? 17 A. Yes. 18 Q. Okay. You've seen this document 18 A. Yes. 19 before? 19 Q. All right. Now, let's go to next 20 A. Yes. 20 employment contract, 31. I'm referring to employment 21 Q. In fact, let's go to the last page of 22 the employment contract, Bates stamp No. 29. Is that 23 your signature, sir? 24 A. Yes. 26 A. Correct. A. Yes. 27 And that's your signature, correct? 28 A. Yes. 29 Employment contract, 31. I'm referring to employment contract for chauffeur, Bates stamp No. 31. 20 Now, do you recognize this document, 21 Sir? 22 A. Yes.				
17 Q. And that's your signature, correct? 18 Q. Okay. You've seen this document 18 A. Yes. 19 before? 19 Q. All right. Now, let's go to next 20 A. Yes. 21 Q. In fact, let's go to the last page of 21 contract for chauffeur, Bates stamp No. 31. 22 the employment contract, Bates stamp No. 29. Is that 23 your signature, sir? 24 A. Yes. 26 And that's your signature, correct? 28 Pos. 29 Pos. 20 And that's your signature, correct? 20 Contract for chauffeur, Bates stamp No. 31. 21 Now, do you recognize this document, 22 Sir? 23 Sir? 24 A. Yes.				· ·
18 Q. Okay. You've seen this document 19 before? 20 A. Yes. 20 In fact, let's go to the last page of 21 the employment contract, Bates stamp No. 29. Is that 22 the employment contract, Bates stamp No. 29. Is that 23 your signature, sir? 24 A. Yes. 18 A. Yes. 20 employment contract, 31. I'm referring to employment 21 contract for chauffeur, Bates stamp No. 31. 22 Now, do you recognize this document, 23 sir? 24 A. Yes.				
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23 your signature, sir? 24 A. Yes. 23 sir? 24 A. Yes.				
24 A. Yes. 24 A. Yes.				
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HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 38..41

	11yumuy Nan		02/22/2022 1 ages 304
1	Page 38 isn't it?	1	Page 40 Q. You were able to retain a fully
2	A. Yes.	2	executed copy in your possession?
3	Q. And, in fact, again, this is a one-year	3	A. Yes.
4	term, right?	4	Q. Okay. Let's go to Bates stamp No.
5	A. Correct.	5	41. Now, you see the pledge agreement, sir?
6	Q. And let's go to Bates stamp No. 35	6	A. Yes.
7	which is the last page of the employment contract.	7	Q. This is the same pledge agreement you
8	Do you see your signature there?	8	signed every year; is that correct?
9	A. Yes.	9	A. Correct.
10	Q. Okay. Did you sign it on July 1, 2019,	10	Q. This is a document that you also signed
11	or some other date?	11	at the time that you signed the employment contract
12	A. Some other date.	12	for chauffeur; is that correct?
13	Q. Okay. Who presented this document to	13	A. Yes, probably.
14	you?	14	Q. Okay. That's your signature?
15	A. Well, if this is back in 2019, at the	15	A. Yes.
16	time there were two secretaries. I don't know which	16	
17	one of the two.	17	Q. You signed it voluntarily? A. Yes.
18	Q. Okay. That's fine. But you signed it	18	Q. Okay. Let's go to the last contract.
19	voluntarily?	19	MR. KWAK: D-6.
20	A. Yes.	20	(Defendant's Exhibit 6, 2021 papers
21	Q. Okay. And you were able to retain a	21	with translation, was marked for
22	copy, signed copy of this document; is that correct?	22	identification.)
23	A. Correct.	23	Q. Okay. Now, I'm referring to the
24		24	
25	Q. Okay. In fact, you've been keeping	25	document Bates stamped No. 42, employment contract for chauffeur.
23	these documents 2016, '17, '18, even '19 since 2016,	25	for chauffeur.
	Page 39		Page 41
1	correct?	1	A. Yes.
2	A. Correct.	2	Q. This is the same employment contract
3	Q. All right. Now, let's go to Bates	3	that you signed every year or substantially similar,
4	stamp No. 36 of the employment contract.	4	correct?
5	MR. KWAK: That's a new exhibit. D-5.	5	A. Correct.
6	(Defendant's Exhibit 5, 2020 papers	6	Q. And it is a one-year term?
7	with translation, was marked for	7	A. It depends on when I received the
8	identification.)	8	contract because at that time instead of a one-year
9	Q. All right. Okay. Let's go through the	9	contract, there was a change in the minister and he
10	drill again. This is the same employment contract	10	
			was late arriving. However, I received initially
11	for 2020, is that correct, sir?	11	one-year contract and then I received a revised
12	for 2020, is that correct, sir? A. Correct.	11 12	one-year contract and then I received a revised version afterward.
12 13	for 2020, is that correct, sir?	11 12 13	one-year contract and then I received a revised version afterward. Q. Okay. We'll find out. Now, let's go
12 13 14	for 2020, is that correct, sir? A. Correct. Q. And this is a one-year term? A. Yes.	11 12 13 14	one-year contract and then I received a revised version afterward. Q. Okay. We'll find out. Now, let's go to the last page of the contract, referring to Bates
12 13 14 15	for 2020, is that correct, sir? A. Correct. Q. And this is a one-year term? A. Yes. Q. And let's go to the last page of the	11 12 13 14 15	one-year contract and then I received a revised version afterward. Q. Okay. We'll find out. Now, let's go
12 13 14 15 16	for 2020, is that correct, sir? A. Correct. Q. And this is a one-year term? A. Yes.	11 12 13 14 15 16	one-year contract and then I received a revised version afterward. Q. Okay. We'll find out. Now, let's go to the last page of the contract, referring to Bates
12 13 14 15	for 2020, is that correct, sir? A. Correct. Q. And this is a one-year term? A. Yes. Q. And let's go to the last page of the	11 12 13 14 15	one-year contract and then I received a revised version afterward. Q. Okay. We'll find out. Now, let's go to the last page of the contract, referring to Bates stamp No. 46. You see your signature there, correct?
12 13 14 15 16	for 2020, is that correct, sir? A. Correct. Q. And this is a one-year term? A. Yes. Q. And let's go to the last page of the employment contract. That's your signature, sir?	11 12 13 14 15 16	one-year contract and then I received a revised version afterward. Q. Okay. We'll find out. Now, let's go to the last page of the contract, referring to Bates stamp No. 46. You see your signature there, correct? A. Yes.
12 13 14 15 16 17	for 2020, is that correct, sir? A. Correct. Q. And this is a one-year term? A. Yes. Q. And let's go to the last page of the employment contract. That's your signature, sir? A. Yes.	11 12 13 14 15 16 17	one-year contract and then I received a revised version afterward. Q. Okay. We'll find out. Now, let's go to the last page of the contract, referring to Bates stamp No. 46. You see your signature there, correct? A. Yes. Q. You signed it voluntarily?
12 13 14 15 16 17	for 2020, is that correct, sir? A. Correct. Q. And this is a one-year term? A. Yes. Q. And let's go to the last page of the employment contract. That's your signature, sir? A. Yes. Q. This time, let's see, was it also	11 12 13 14 15 16 17	one-year contract and then I received a revised version afterward. Q. Okay. We'll find out. Now, let's go to the last page of the contract, referring to Bates stamp No. 46. You see your signature there, correct? A. Yes. Q. You signed it voluntarily? A. Yes.
12 13 14 15 16 17 18	for 2020, is that correct, sir? A. Correct. Q. And this is a one-year term? A. Yes. Q. And let's go to the last page of the employment contract. That's your signature, sir? A. Yes. Q. This time, let's see, was it also signed on July 1, 2020?	11 12 13 14 15 16 17 18 19	one-year contract and then I received a revised version afterward. Q. Okay. We'll find out. Now, let's go to the last page of the contract, referring to Bates stamp No. 46. You see your signature there, correct? A. Yes. Q. You signed it voluntarily? A. Yes. Q. Okay. It's written in Korean?
12 13 14 15 16 17 18 19	for 2020, is that correct, sir? A. Correct. Q. And this is a one-year term? A. Yes. Q. And let's go to the last page of the employment contract. That's your signature, sir? A. Yes. Q. This time, let's see, was it also signed on July 1, 2020? A. No, at the time there was a change of	11 12 13 14 15 16 17 18 19 20	one-year contract and then I received a revised version afterward. Q. Okay. We'll find out. Now, let's go to the last page of the contract, referring to Bates stamp No. 46. You see your signature there, correct? A. Yes. Q. You signed it voluntarily? A. Yes. Q. Okay. It's written in Korean? A. Yes.
12 13 14 15 16 17 18 19 20 21	for 2020, is that correct, sir? A. Correct. Q. And this is a one-year term? A. Yes. Q. And let's go to the last page of the employment contract. That's your signature, sir? A. Yes. Q. This time, let's see, was it also signed on July 1, 2020? A. No, at the time there was a change of ministers and Mr. Jo came into the picture, and I	11 12 13 14 15 16 17 18 19 20 21	one-year contract and then I received a revised version afterward. Q. Okay. We'll find out. Now, let's go to the last page of the contract, referring to Bates stamp No. 46. You see your signature there, correct? A. Yes. Q. You signed it voluntarily? A. Yes. Q. Okay. It's written in Korean? A. Yes. Q. Now, let's go to the next page what
12 13 14 15 16 17 18 19 20 21 22	for 2020, is that correct, sir? A. Correct. Q. And this is a one-year term? A. Yes. Q. And let's go to the last page of the employment contract. That's your signature, sir? A. Yes. Q. This time, let's see, was it also signed on July 1, 2020? A. No, at the time there was a change of ministers and Mr. Jo came into the picture, and I believe I signed this document in or around October	11 12 13 14 15 16 17 18 19 20 21 22	one-year contract and then I received a revised version afterward. Q. Okay. We'll find out. Now, let's go to the last page of the contract, referring to Bates stamp No. 46. You see your signature there, correct? A. Yes. Q. You signed it voluntarily? A. Yes. Q. Okay. It's written in Korean? A. Yes. Q. Now, let's go to the next page what appears to be a pledge agreement.

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 42..45

	Hyunnuy Nan		1 ages 4245
1	Page 42 Q. You signed it?	1	Page 44 A. This language was included in a
2	A. Yes.	2	document that I was shown at the time of my hiring.
3	Q. And at the same time that you signed	3	Q. Okay. So do you now does that
4	the employment contract for chauffeuring in 2021, you	4	refresh your recollection?
5	signed it?	5	A. Yes.
6	A. Well, based on as far as I can	6	Q. Does that refresh your recollection as
7	remember, they were probably signed at the same time	7	to whether you signed a form that authorized the
8	even though I only received one pledge agreement,	8	Mission to conduct a background check on you?
9	whereas, I received two different employment	9	A. Well, I mean, that form was included
10	contracts.	10	with the other document that I needed to sign at the
11	Q. Okay. So now, so let's clarify for the	11	time of my hiring, so I would have to say yes, I
12	record because we went through some documents here.	12	signed it.
13	It's safe to say that since 2016 you began to work at	13	Q. Okay. Now, were you aware or are you
14	the Mission, every year you signed an employment	14	aware today that the Mission had to conduct a
15	contract as well as a pledge agreement; is that	15	background check on you, once in the United States
16	correct, sir?	16	and once in Korea by the South Korean government in
17	A. Correct.	17	order for you to work at the Mission?
18	Q. Every contract is a one-year term?	18	A. Yes.
19	A. Yes.	19	Q. Okay. In fact, they did conduct a
20	Q. And you were able to retain a fully	20	background check on you. You passed the security
21	executed copy of every document you signed?	21	clearance, correct?
22	A. Yes.	22	A. Yes.
23	Q. And every document is written in	23	Q. Now, your job at the Mission was to
24	Korean?	24	drive for the ministers that had been working at the
25	A. Yes.	25	Mission, correct?
25	Α. 105.	23	mission, correct.
_	Page 43		Page 45
1 2	Q. If you wanted to, you could always read	1 2	A. Yes.
	it at any time?		Q. Not the ambassador, right?
3	A. Correct.	3 4	A. Correct.
4	Q. Okay.		Q. Not any other just employee but the
5	MR. ZHU: Just, again, I instruct my	5	ministers, correct?
6	client, wait for the question.	6	A. Now, no, because initially when Mr. Ko
7	Q. Okay. Now, after you signed this	7	explained my work for me, he told me that the vehicle
8	pledge agreements and employment contracts, did you	8	that I was driving was an official car. So anyone
9	at any point tell anyone, especially the ministers	9	who was who had an official duty at the Mission
10	you were working for, that this is a wrong contract,	10	was able to utilize that car and even myself, if I
11	unfair contract and I don't want to sign? Did you	11	had an official duty, I could use that car.
12	tell any minister?	12	Q. I understand. Hold on, there is no
13	A. No. O. Now, and at the time you began to work	13	question pending. There is no question pending. I'm
14		14	asking you. Don't worry, we'll get there.
15	at the Mission on July 1, 2016, do you recall you had	15	So, you were the designated driver for
16	to sign documents authorizing the Mission to conduct a background check on you for security clearance?	16 17	the ministers, correct?
17			A. No, I was not.
18	A. I can't recall.	18	Q. Are you saying that there was someone
19	MR. LIM: Mark this.	19	else designated for the ministers?
20	(Defendant's Exhibit 7, consent form,	20	A. No.
21	was marked for identification.)	21	Q. So that's my question. I want you to
22	Q. Now, I'm now presenting to you the	22	listen to me very carefully. According to this
23	consent form that you actually signed, but I'm	23	contract that you signed, your primary duty was to
24	presenting to you language that the consent form had.	24	drive for the ministers, correct?
25	It's in Korean. I want you to read it.	25	MR. ZHU: Objection. Document speaks

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 46..49

				<i>UZI ZZI ZUZZ</i>	1 ages 4049
1	for itself.	Page 46	1		Page 48 MR. ZHU: Objection.
2	A.	However, even though the contract may	2	Q.	Any other driver.
3		at Mr. Ko told me that he was a	3	2. A.	No.
4	-	ublic servant and as a (redacted) public	4	Q.	Excuse me, hold it. There is no
5		as not allowed to hire a personal driver.	5	question pend	•
6	Q.	Sir, my question is this: There was a	6	daeperon bon	Now, we're going to go through the
7	_	river for the ambassadors, correct?	7	contract and	pledge agreements. Okay? Let's go to
8	A.	Correct.	8	2016 contract	
9	Q.	There was a designated driver for the	9	A.	Could I correct my answer?
10	ministers, co	•	10	Q.	No, we're going to go back later.
11	minibeerby ex	MR. ZHU: Objection. Asked and	11	٧.	2016. Now, let's go to paragraph 2,
12	answered.	rat. 200 objection. Asked and	12	No. 4.	2010. Now, let b go to paragraph 2,
13	A.	Not for the ministers.	13	110. 4.	Before that, if you look at paragraph
14	Q.	There was no designated driver for the	14	1 vou see th	ne name of the minister that you worked
15	ministers at		15	for, correct?	
16	miniscers ac	MR. ZHU: Asked and answered.	16	A.	Yes.
17	Α.	Because I was told the (redacted) or	17	Q.	Okay. And let's go to paragraph 2, No.
18		fficials would not get a designated	18	_	read it to yourself?
19	driver.	illicials would not get a designated	19	A.	Yes, I'm done.
20	0.	At the time you worked at the Mission,	20	0.	Okay. According to this contract, you
21	-	ffice and you shared that office with	21	_	wed to engage in activities that give you
22	_	did research, correct?	22		nefit unless you first obtain permission
23	Α.	Well, it wasn't my office. It was a	23		sion; is that correct?
24		for a chauffeur.	24	Α.	Correct.
25	Q.	I understand. You waited at the	25	Q.	Okay. And, in fact, did you work for
1	office?	Page 47	1	anvone else t	Page 49 that gave you financial benefit while
2	Α.	Yes.	2	_	ne Mission without permission from the
3		MR. ZHU: Objection. Mischaracterize.	3	Mission?	
4		MR. LIM: Okay. Excuse me. Excuse me.	4	Α.	No.
5	Okav it's m	y deposition. Okay.	5	Q.	Okay. Let's go to the next paragraph,
6	Q.	Did you have a designated car at the	6	-	ding to this contract you're not
7		ked at the Mission?	7		engage in any act that's contrary to the
8	A.	Yes, the official car.	8		erests of South Korea; is that correct?
9	Q.	What's the model and the type, the	9	Α.	Yes.
10	make?	2	10	Q.	Did you do anything that's contrary to
11		MR. ZHU: Objection. Compound.	11		interests of South Korea?
12	A.	2015 Genesis.	12	А.	No.
13	Q.	Did you drive the car at all times?	13	Q.	At any time?
14	χ. Α.	Yes.	14	2. A.	Correct.
15	Q.	Did anyone else drive that car besides	15	Q.	Okay. Now, let's go to No. 6.
16	you?		16	-	this term you will be penalized
17	A.	No.	17	_	South Korean laws if you ever divulge
18	Q.	Only you drove that car?	18	_	that you learned or acquired during the
19	Α.	So, since that was the only car, if I	19		r employment.
20		to drive somebody, then that was the	20		MR. ZHU: Objection. No question
21	car that I us		21	pending.	J
22	Q.	That was the official car provided by	22	А.	Correct.
23	the Mission?		23	Q.	Did you do anything that violates this
24	Α.	Correct.	24	term?	
25	Q.	Now, did anyone else drive that car?	25	Α.	Other than the personal information
1	z.				The state of the s

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 50..53

_	nijumiuj 1 tun		_
1	Page 50 relating to A, minister's family, I have never	1	Page 52 instructing you don't give me a narrative, just
2	divulged any official information related to the	2	answer my questions.
3	Mission.	3	MR. ZHU: I object to this
4	Q. In fact, during the course of	4	unfortunately on the record.
5	employment at the Mission you're not allowed to tell	5	MR. LIM: Can you read back my
6	anyone where the ministers went, who the ministers	6	question?
7	met and what they discussed in the car or outside of	7	You know what, let me just keep it
8	the car, correct?	8	simple. I'll show him the exhibit. This is simple.
9	A. Correct.	9	You need to mark it.
10	Q. In fact, are you telling me that you	10	(Defendant's Exhibit 8, time records,
11	did not tell anyone about that to this day?	11	were marked for identification.)
12	A. Correct.	12	Q. Okay. Now, I want to show you been
13	Q. Okay. Now, corresponding to this	13	marked as D-8. Have you seen this document?
14		14	-
	contract, paragraph 4, your working hours are from 9		
15	to 6 p.m., is that right? 9 a.m. to 6 p.m., correct?	15	Q. Okay. Can you tell me what that is?
16	A. Yes.	16	A. It is the record of my overtime work
17	Q. In case you had to work beyond these	17	hours.
18	working hours, you had to report to the Mission,	18	Q. Okay. So this is exactly what I meant
19	correct?	19	by that earlier when I asked you did you ever work
20	A. I never I was never told to report	20	beyond the designated working hours from 9 a.m. to 6
21	it to the Mission.	21	p.m. You said yes, correct?
22	Q. Were you ever did you ever report	22	A. Yes.
23	the extra hours you worked beyond these designated	23	Q. And, in fact, each time you worked
24	working hours?	24	beyond the designated working hours, the overtime you
25	A. No, I was never told that I could I	25	were able to write down the hours you worked, the
	Page 51		Page 53
1	should record the extra hours I worked to the	1	extra hours you worked, correct?
2	Mission, had I been explained this or had I been	2	A. Correct.
3	instructed to do so, I may have, however, I only	3	Q. Okay. And you were paid for those
4	followed the instructions that I was given and I only	4	extra hours, overtime hours according to the contract
5	executed the executed my duties that I was	5	that's indicated here; is that correct?
6	supposed to do.	6	A. Not all of it.
7	Q. Are you telling me that there wasn't	7	Q. Okay. We'll get there. Okay. But
8	any occasion when you worked beyond these designated	8	now, when you wrote down these hours, these hours are
9	working hours?	9	based on your records; is that correct?
10	A. No, there were many occasions.	10	A. Well, basically I entered the
11	Q. I understand that. So in those cases	11	information based on the note that I had, however,
12	when you worked more than these designated hours, did	12	once this document was submitted, the secretaries
13	you report to the Mission to get overtime?	13	adjusted the hours according to the contract.
14	MR. ZHU: Objection. Asked and	14	Q. Okay. Can you show me one example that
15	answered.	15	your work hours were adjusted?
16	(Witness answering in Korean not yet	16	A. Now, the secretaries would not touch
17	translated.)	17	the information, it was always the ministers. So,
18	MR. LIM: Excuse me. No, we're going	18	for instance, I actually wanted to add my lunch hour
19	to go off the record because he's about to do he's	19	which was one hour into the payable hour, however,
20	about to breach the confidentiality, that's why.	20	the ministers felt that because I was not working but
21	Go off the record.	21	waiting, that's considered a wait time, so they
22	(Discussion off the record.)	22	refused to include that as my work hour.
23	MR. LIM: We're going to go back.	23	Q. Okay. So now show me other than the
24	BY MR. LIM:	24	lunch hour, show me the hours that were adjusted by
25	Q. Now, Mr. Nam, again, on the record I'm	25	the Mission.
	2,		

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		ily dimay 14dii		1 02/22/2022
1	Α.	Page 54 Well, so Mr. Ko and Mr. Han was never	1	Page 56 A. No.
2		adjusting the hours. It was just	2	Q. So you just got cash?
3	Mr. Lee, Jung		3	A. No, I wanted to be paid in checks so I
4	Q.	Show me the records that were adjusted	4	could report my earnings on taxes.
5	by Lee.		5	Q. Okay. Now, let's go to pledge
6	D2	MR. ZHU: Is there a question?	6	agreement, Bates No. 14.
7		MR. LIM: I asked him.	7	MR. LIM: After this we're going to
8	Α.	I wouldn't be able to tell you just	8	take a short break. Okay?
9		ecord. I would have to use my own record	9	MR. ZHU: Yes.
10		it with this record.	10	Q. Now, pledge agreement, this is the same
11	Q.	Okay. Other than Lee, did anyone else	11	form that you signed every year for five years; is
12	adjust your		12	that correct?
13	A.	No.	13	A. Yes.
14	Q.	Okay. Now, do you have notes that	14	Q. According to paragraph 1 strike
15	_	ne discrepancy, the alleged discrepancy	15	that.
16		you reported and the actual hours you	16	Before that, if you look at the
17	worked?	for reported and the decidar nours for	17	preamble, it says you solemnly swear to abide by the
18	A.	Yes.	18	following terms, is that correct?
19	Q.	Okay. Do you have it now with you?	19	A. Yes.
20	λ. Α.	My attorney has it.	20	Q. And would you say that you had
21	11.	MR. LIM: Did counsel produce that?	21	strike that.
22		MR. BAE: Yes.	22	Have you ever engaged in any act that
23		MR. LIM: Are you referring to the	23	breaches this pledge agreement?
24	memos?	The four releasing to the	24	A. No.
25	memos.	MR. KWAK: The notepads, right, Yellow	25	Q. Okay. Let's go over two paragraphs,
		The Hotopads / Tighte / Terror		g. olay. Let b 50 over the paragraphs,
1	Pages?	Page 55	1	Page 57
2	rages:	MR. BAE: Yes.	2	okay? Paragraph 1, it says, any information that you may acquire during the course of your employment
3	BY MR. LIM:	PIR. DAE: 165.	3	
4		Co regular garring that regular not able		while driving the official vehicle for the Mission,
5	Q.	So you're saying that you're not able	4 5	you will not divulge any classified information, any
		ne hour lunch and Mr. Lee allegedly		secret, even after you are no longer employed by the
6		r work hours?	6	Mission, correct?
7	Α.	Yes.	7	A. Correct.
8	Q.	Just one hour lunch or more than that?	8	Q. Okay. Have you divulged, disclosed,
9	Α.	It's more than that.	9	told anyone the information, the classified
10	Q.	Okay. All right. We'll get there,	10	information that you acquired during the course of
11	okay: we:II	come back to this.	11	your employment?
12	love also	MR. ZHU: Counsel, can we have a short	12	A. No, except for the ones who are
13	break?	MD ITM: Hold on Time almost down	13	involved in this lawsuit, the defendants.
14	i+h +h=	MR. LIM: Hold on. I'm almost done	14	Q. Okay. You understand that this pledge
15	with the conf		15	agreement is incredibly critically important to you
16	Q.	Let's come back to 2016 contract. Now,	16	performing your job; is that correct? Yes?
17		paragraph 5, No. 6. According to this	17	A. Correct.
18	contract, you	u understand that the Mission is exempt	18	Q. In fact, you were reminded repeatedly
	£	payroll tax, such as Social Security and	19	by the people at the Mission how important it is for
19		a that sameast?	20	you to keep the information you learned top secret,
19 20	et cetera; i	s that correct?		
19 20 21	et cetera; i	Yes.	21	correct?
19 20 21 22	et cetera; is	Yes. In fact, you got paid in cash, correct?	21 22	correct? MR. ZHU: Objection to form. Time
19 20 21 22 23	et cetera; is A. Q. A.	Yes. In fact, you got paid in cash, correct? Yes.	21 22 23	$\mbox{\sc correct?}$ MR. ZHU: Objection to form. Time frame.
19 20 21 22	et cetera; is	Yes. In fact, you got paid in cash, correct?	21 22	correct? MR. ZHU: Objection to form. Time

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	Hyunnuy Nan	ı vıı	1 ages 5001
1	Page 58 My question is this: Again, let's go	1	Page 60 MR. ZHU: Objection to the form. I'll
2	to paragraph 2. Let's go to paragraph 2. And	2	object to the previous question which was already
3	according to this paragraph 2, you said you are	3	answered.
4	willing to bear any punishment in case you breached	4	MR. LIM: Okay.
5	this pledge agreement, correct?	5	Q. Now, I want to direct your attention to
6	A. Yes.	6	No. 4, under paragraph 2, again, which is on Bates
7	Q. Okay. In fact, you would be	7	stamped No. 15. The same term as the 2016, that is
8	responsible for any and all financial liabilities as	8	you're not supposed to engage in activities that will
9	well, correct?	9	give you financial benefit other than the job that
10	A. Yes.	10	you're supposed to perform for the Mission unless you
11	Q. Okay. So you're testifying as you sit	11	first get advanced permission from the Mission,
12	here today you have never done anything that breached	12	correct?
13	this pledge agreement, correct?	13	A. Correct.
14	MR. ZHU: Objection. Asked and	14	Q. So you're testifying as you sit here
15	answered.	15	today that you did not engage in any activities that
16	A. That's correct.	16	violate, that breach this term; is that correct?
17	Q. Okay. We're going to take a	17	A. Correct.
18	five-minute break. We to come back and I'm advising	18	Q. Now, let's go to page 16, No. 5 under
19	you once been you cannot talk to counsel about your	19	paragraph 2. It's the same term as in 2016, you're
20	prior testimony. We'll come back and go through the	20	not supposed to do anything that's contrary to the
21	rest.	21	national interests of South Korea; is that correct?
22	(Discussion held off the record.)	22	A. Correct.
23	(Luncheon recess taken.)	23	Q. Have you done anything that would
24	(Editoricon recess careir.)	24	breach or that breached this term?
25		25	A. No.
23		23	A. NO.
	Page 59		Page 61
1	AFTERNOON SESSION	1	Q. Let's go to No. 6. Again, the same
2	12:38 p.m.	2	term as in 2016, correct?
3	HYUNHUY NAM, having been previously duly sworn by a	3	A. Correct.
4	Notary Public, was examined and testified further as	4	Q. And you're not supposed to divulge any
5	follows:	5	information that you learned or acquired during the
6	MR. LIM: My colleague and I, we	6	course of your employment to anyone because this is a
7	discussed certain terms to be redacted, and based	7	secret, correct?
8	that on stipulation certain terms will be stricken	8	A. Correct.
9	and redacted. And thank you so much for your	9	Q. And classified information, correct?
10	courtesy. I appreciate that.	10	A. Correct.
11	EXAMINATION Continued	11	Q. And, in fact, if you do, it says you'll
12	BY MR. LIM:	12	be penalized according to South Korean laws; is that
13	Q. And, again, Mr. Nam, going forward, I	13	right?
14	want you to be mindful of the pledge agreement that	14	A. Correct.
1 -		15	Q. Are you saying that you have never done
15	you signed. Okay?		
16	(Discussion off the record.)	16	anything that violates this term?
16 17	(Discussion off the record.) Q. So, we just finished reviewing 2016	16 17	anything that violates this term? A. Correct.
16 17 18	(Discussion off the record.) Q. So, we just finished reviewing 2016 agreements. Now we're going to go through 2017.	16 17 18	anything that violates this term? A. Correct. Q. Okay. Let's go to paragraph 5, No. 6.
16 17 18 19	(Discussion off the record.) Q. So, we just finished reviewing 2016 agreements. Now we're going to go through 2017. Now, 2017, if you look at the first page which is	16 17 18 19	A. Correct. Q. Okay. Let's go to paragraph 5, No. 6. The same term as in 2016, it reminds you that the
16 17 18 19 20	(Discussion off the record.) Q. So, we just finished reviewing 2016 agreements. Now we're going to go through 2017. Now, 2017, if you look at the first page which is Bates stamped No. 15, the content is almost identical	16 17 18 19 20	A. Correct. Q. Okay. Let's go to paragraph 5, No. 6. The same term as in 2016, it reminds you that the Mission is exempt from paying any payroll tax
16 17 18 19 20 21	(Discussion off the record.) Q. So, we just finished reviewing 2016 agreements. Now we're going to go through 2017. Now, 2017, if you look at the first page which is	16 17 18 19 20 21	A. Correct. Q. Okay. Let's go to paragraph 5, No. 6. The same term as in 2016, it reminds you that the
16 17 18 19 20 21	(Discussion off the record.) Q. So, we just finished reviewing 2016 agreements. Now we're going to go through 2017. Now, 2017, if you look at the first page which is Bates stamped No. 15, the content is almost identical	16 17 18 19 20	A. Correct. Q. Okay. Let's go to paragraph 5, No. 6. The same term as in 2016, it reminds you that the Mission is exempt from paying any payroll tax
16 17 18 19 20 21 22 23	(Discussion off the record.) Q. So, we just finished reviewing 2016 agreements. Now we're going to go through 2017. Now, 2017, if you look at the first page which is Bates stamped No. 15, the content is almost identical as the 2016 document, correct?	16 17 18 19 20 21 22 23	anything that violates this term? A. Correct. Q. Okay. Let's go to paragraph 5, No. 6. The same term as in 2016, it reminds you that the Mission is exempt from paying any payroll tax including Social Security, correct?
16 17 18 19 20 21 22 23 24	(Discussion off the record.) Q. So, we just finished reviewing 2016 agreements. Now we're going to go through 2017. Now, 2017, if you look at the first page which is Bates stamped No. 15, the content is almost identical as the 2016 document, correct? A. Yes. Q. Okay. Your work hours, correct? A. Correct.	16 17 18 19 20 21 22 23 24	anything that violates this term? A. Correct. Q. Okay. Let's go to paragraph 5, No. 6. The same term as in 2016, it reminds you that the Mission is exempt from paying any payroll tax including Social Security, correct? A. Correct. Q. And you got paid in cash, correct? A. Yes.
16 17 18 19 20 21 22 23	(Discussion off the record.) Q. So, we just finished reviewing 2016 agreements. Now we're going to go through 2017. Now, 2017, if you look at the first page which is Bates stamped No. 15, the content is almost identical as the 2016 document, correct? A. Yes. Q. Okay. Your work hours, correct?	16 17 18 19 20 21 22 23	anything that violates this term? A. Correct. Q. Okay. Let's go to paragraph 5, No. 6. The same term as in 2016, it reminds you that the Mission is exempt from paying any payroll tax including Social Security, correct? A. Correct. Q. And you got paid in cash, correct?

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	iiyamay 11an		1 ugcs 02::05
1	Page 62 attention to No. 7, under paragraph 7. Okay. Isn't	1	Page 64 that you signed in 2017 is exactly identical as the
2	it true that paragraph 7 lists seven categories which	2	one that you signed in 2016, correct?
3	may give a ground for termination?	3	A. Yes.
4	A. Yes.	4	Q. And did you do anything that breached
5	Q. Okay. And if you look at paragraph	5	this pledge agreement at any time?
6	5 I'm sorry, not paragraph 5, No. 5, there are	6	A. No.
7	four categories that the Mission would review to	7	Q. And, in fact, according to this pledge
8	determine whether or not your performance is	8	agreement, it says any and all information you
9	satisfactory, correct?	9	acquired is significant and critical, top secret,
10	A. Correct.	10	correct?
11	Q. Number one was diligence, correct?	11	A. But I have a question.
12	A. Yes.	12	Q. No, you cannot ask questions.
13	Q. Number two, responsibility, correct?	13	A. Yes.
14	A. Yes.	14	Q. Okay. Next, let's go to page 20. It's
15	Q. Number three, the ability to perform	15	Bates stamped No. 20.
16	your job, correct?	16	THE INTERPRETER: There is no Bates
17	A. Correct.	17	stamp No. 20.
18	Q. Number four, your ability to keep	18	MR. KWAK: That's a different exhibit.
19	matters secret, top secret, correct?	19	MR. ZHU: Can the witness have a copy?
20	A. Correct.	20	MR. LIM: Yes.
21	Q. And would you say that you performed	21	MR. ZHU: For the record we're talking
22	your duties and responsibilities in a way that	22	about D-3.
23	satisfied these conditions?	23	MR. KWAK: Okay, D-3. Yes.
24	A. Yes.	24	MR. LIM: Thank you.
25	Q. Okay. Now, let's go to No. 7 under	25	BY MR. LIM:
	**		22 1211 2211
,	Page 63	1	Page 65 Q. All right. This is a contract that you
1 2	paragraph 7. No. 7, it says one of the grounds for termination is that if you did not keep security	2	Q. All right. This is a contract that you signed in 2018, correct?
3			
4	guidelines, that you could be terminated, correct? A. Correct.	3 4	
5		5	Q. This is another employment contract for
	Q. Did you keep all the security		chauffeur, correct?
6	guidelines?	6	A. Correct.
7	A. Yes.	7	Q. And, in fact, the terms are identical
8	Q. Okay. Let's go to 18. I want to	8	as 2016 and '17 employment contract; is that correct?
9	direct your attention to paragraph 9 on the document	9	A. Yes.
10	Bates stamped No. 18. There it says the Mission	10	Q. Okay. Now, again, let me ask you this:
11	could permit your vacation days at its discretion	11	Paragraph 2, No. 5, in 2018 did you do anything
12	subject to compliance with the Republic of Korea	12	that's contrary to the national interests of South
13	Diplomatic Offices Executive Employees Guidelines,	13	Korea?
14	correct?	14	A. So, I mean, this is an umbrella
15	A. Yes.	15	question. So what exactly are you trying to ask?
16	Q. And the provision concerning executive	16	Q. Okay. My question is this: Let's go
17	employees vacation days in the Mission's policies,	17	to 6. We're going combine 5 and 6 together. Did you
18	correct?	18	divulge any information you learned to anyone that's
19	A. Correct.	19	not authorized to receive that information?
20	Q. Did you receive some vacation days in	20	MR. ZHU: Objection to the form. Time
21	2017?	21	frame.
22	A. Yes.	22	A. I mean, could you specify the time
23	Q. Okay. Let's go to page 19 I'm	23	frame, please because the question is too broad?
24	sorry, not page 19, Bates No. 19, the pledge	24	Q. I am going over 2019.
25	agreement. You recognize that this pledge agreement	25	A. So could you be more specific with your

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	11yumuy Nai		
1	Page 66 questions, please because with regard to this person	1	A. Could you be more specific?
2	who is involved in during this year, there is a lot	2	Q. No. Look, I'm asking you. If you
3	of	3	know, you know. If you don't know, you don't know.
4	Q. Sure. Sure.	4	Did you do anything that violated this term?
5	A stories or issues.	5	MR. ZHU: Instruction to my client, if
6	Q. And did you tell anyone who the	6	don't understand the question, let us know, ask
7	minister met, what the minister did and where the	7	defense counsel to rephrase or repeat it for you.
8	minister went and what he discussed to anyone that is	8	A. I mean, unless you ask me specific
9	not authorized to know?	9	questions, it would be difficult for me to answer
10	MR. ZHU: Objection to the form.	10	that question because this contract is very broad.
11	You can answer if you understand.	11	Q. Okay. Let me ask you this: Mr. Nam,
12	Q. Yes or no?	12	do you believe, do you believe that you engaged in
13	A. Could you be more specific, please?	13	any act that would violate this particular term,
14	Q. I cannot be more specific than this.	14	paragraph 7, No. 5, or
15	I'm asking you again. I'll just repeat the question.	15	MR. ZHU: I'll object.
16	Did you tell anyone that is not authorized to know	16	MR. LIM: Excuse me.
17	concerning where the minister went, who the minister	17	MR. ZHU: Objection. Calls for legal
18	met, what the minister did and what the minister	18	conclusion.
19	discussed, yes or no?	19	A. Particularly what do you mean?
20	MR. ZHU: Objection to the form.	20	Q. Let me ask you let's go to paragraph
21	Q. Yes or no?	21	7. I'm going to come back to 5. I want to go over 7
22	MR. ZHU: You can answer if you	22	first.
23	understand.	23	Did you ever divulge, disclose
24	Q. If you didn't, you didn't. If you did,	24	information that you learned during the course of
25	tell me when.	25	employment in 2018 to anyone that is not authorized
1	Page 67 A. I choose not to answer.	1	Page 69 to know concerning what the minister did, where the
2	Q. You have to answer my questions.	2	minister went, what the minister discussed, who the
3	A. I do not know.	3	minister met?
4	Q. You understand that if you violated	4	MR. ZHU: Objection to the form.
5	this term, you could be punished according to South	5	You can answer if you understand it.
6	Korean laws, correct?	6	A. I mean, first of all, it's too broad.
7	MR. ZHU: Objection. Asked and	7	There has been too many things that occurred and
8	answered.	8	there are many issues. So if you can be more
9	A. I do understand.	9	specific, I may be able to answer your questions.
10	Q. Okay. Now, we're going to skip, going	10	Q. If you continue to refuse to answer,
11	to go through some questions quickly. Go to Bates	11	we're going to call the judge and we're going to have
12	stamped 22, some questions I don't want to repeat, so	12	the judge direct you to answer my question. Okay?
13	I'll just ask him comprehensive questions.	13	I'm going to give you one more chance.
14	Isn't it true that during the course of	14	MR. ZHU: That is his answer.
15	employment at the Mission, the Mission was exempt	15	MR. LIM: Excuse me, please.
16	from paying any payroll tax including Social	16	Q. I'm going to ask you this question
17	Security, correct?	17	MR. ZHU: He already answered. That's
18	MR. ZHU: Objection. Foundation.	18	harassment.
19	A. Correct.	19	MR. LIM: It's not harassment.
20	Q. Okay. Now, page no, paragraph 7,	20	MR. ZHU: That's harassment.
21	No. 5 and 7. Again, you were aware your performance	21	MR. LIM: Please, put an objection on
22	will be reviewed based on four categories, your	22	the record. Just stop.
23	diligence, responsibility, your ability to perform	23	Q. Do you believe, do you believe
24	your job and your ability to keep information secret.	24	okay
25	Now, did you do anything that violated this?	25	MR. ZHU: Objection
	, jou do day daming disto violation dillo.		The Entry of Journal

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	Try unitary 1 (and		1 ages 7072
1	Page 70 MR. LIM: Excuse me. I understand you	1	Page 72 A. With regard to the violation of that
2	can put an objection on the record.	2	particular term, that was already discussed with my
3	Q. Now let me	3	attorney and I notified them of what that violation
4	MR. ZHU: He already answered.	4	was.
5	MR. LIM: Excuse me.	5	Q. I don't want you to tell me what you
6	Q. Do you believe	6	discussed with your counsel. I'm not entitled to
7	MR. ZHU: Asked and answered.	7	know. I'm not interested in knowing.
8	MR. KWAK: He did not answer. He said	8	Tell me the violations that you have
9	he cannot answer because it's broad.	9	committed according to your belief.
10	MR. ZHU: That's the answer.	10	A. Because in the past I was never
11	MR. KWAK: He specifically refused to	11	instructed with a clear line as to what I should do
12	·	12	and what I should not do and therefore I was not sure
	answer. Stop.		
13	MR. ZHU: Let's get a judge. I	13	or I'm not sure what I have violated.
14	instruct my client not going forward	14	Q. Mr. Nam, you're under oath. You
15	MR. LIM: You know what, let's call the	15	testified earlier that you clearly knew what the
16	judge.	16	minister did, who the minister met, what the minister
17	MR. ZHU: That's the answer. Maybe	17	discussed was top secret and you said you never
18	it's something you don't want, but that's the answer.	18	divulged it to anyone. Now, let me ask you this
19	MR. KWAK: He specifically refused to	19	again, are you lying now or did you lie before?
20	answer.	20	A. In 2016 and 2017 I complied with the
21	(Discussion off the record.)	21	requirement with the conditions of the contracts.
22	(Call placed to Judge Nathan.)	22	Q. But in 2018 you did not?
23	MR. LIM: So I just want to put it on	23	A. No.
24	the record, I'll ask you and let me know what your	24	Q. Didn't I just show you the 2018
25	answer is so that we can use that as a basis to speak	25	contract is identical as 2016 and 2017 contracts?
	Page 71		Page 73
1	to the judge about it. Okay?	1	Now, let me ask you, did you violate the terms of
2	MR. ZHU: You can move on.	2	this contract in 2018 or do you believe? If you
3	MR. LIM: No, I'm going to put it on	3	don't believe, that's fine, we're moving on.
4	the record so that look, this is the witness's	4	A. Well, I don't believe I violated any
5	answer so that we can tell the judge this what we	5	conditions.
6	have, let us know whether or not we can ask more.	6	Q. Okay. So, let's go to 2019. This is,
7	MR. KWAK: Can you just read back the	7	in fact, the same contract as 2016, '17 and '18,
8	last question.	8	correct?
9	(The record was read as follows:	9	A. Correct.
10	"QUESTION: Did you ever divulge, disclose	10	Q. Okay. Now, isn't it true that if you
11	information that you learned during the	11	look at the document Bates No. 28, No. 8 and 9, how
12	course of employment in 2018 to anyone that	12	you will be evaluated, there are four categories,
13	is not authorized to know concerning what the	13	right, diligence, responsibility, your ability to
14	minister did, where the minister went, what	14	perform your job, your ability to keep information
15	the minister discussed, who the minister met?	15	top secret, right?
16	Q. Your answer?	16	A. Correct.
17	A. It's difficult for me to answer it	17	Q. And, in fact, these terms appear in
18	because there are a lot of personal matters that	18	every contract, correct?
19	occurred. And with regard to the duties that I	19	A. Yes.
20	performed, I don't know if all of them were official	20	Q. In fact, the next one, No. 9, you could
21	or personal. It's difficult to decipher those two.	21	be terminated for not keeping the information,
22	Q. Okay. Do you believe that you have	22	classified information secret, that could be a ground
23	violated this term?	23	for termination, correct?
24	MR. ZHU: Objection to the form. Calls	24	A. Yes.
25	for a legal conclusion.	25	Q. In fact, this requirement appears in
			x. In 2000, ones requirement appears in
	·		-

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1	Page 74 every contract, right?	1	Page 76 MR. ZHU: I don't have Bates stamp 36
2	A. Yes.	2	here.
3	Q. Okay. Let's go to pledge agreement,	3	MR. LIM: You don't?
4	Bates stamp No. 30. Now, I want to direct your	4	MR. ZHU: Yeah, I got it. It's D-5
5	attention to paragraph 3 of this pledge agreement.	5	right now?
6	There it says if the Mission requires, you will	6	MR. KWAK: Yes.
7	submit yourself voluntarily to the polygraph test	7	Q. 36, this contract is virtually
8	concerning whether or not you violated your duties	8	substantially similar to the previous ones that we
9	and responsibilities concerning keeping information	9	have reviewed so far; is that right?
			A. Correct.
10	secret, correct?	10	
11	A. Correct.	11	Q. Okay.
12	Q. Have you ever submitted yourself to a	12	A. But not identical, though, because the
13	polygraph test?	13	person the signer who signed his name is
14	A. No.	14	different.
15	Q. Has ever anyone requested a polygraph	15	Q. Of course. That goes without saying.
16	test?	16	That goes without saying.
17	A. No.	17	A. So, my answers were in accordance with
18	Q. Let's go to the next one. And I just	18	what I just said.
19	want to confirm because it's the same questions, so I	19	Q. Okay. No problem.
20	want to quickly just confirm, 2019 contract, Bates	20	Let's go to Bates No. 39 and I'll just
21	No. 31, essentially these are the same contracts as	21	quickly go through this. Again, under paragraph 7,
22	2016, '17 and '18; is that correct?	22	No. 8 and 9, the same terms that appear in previous
23	A. Correct.	23	contracts appear here again; is that right?
24	Q. Okay. In fact, No. 6, under paragraph	24	A. Yes.
25	2 I'm sorry, No. 5, you're not supposed to engage	25	Q. Again and again you're reminded of how
	7		D ===
1	Page 75 in any act that's contrary to the national interests	1	Page 77 important it is for you to keep classified
2	of South Korea; is that right? This is the same term	2	information secret; is that right?
3	that appears in every contract, right?	3	A. Correct.
4	A. Yes, that's correct.	4	Q. Okay. Let's go to page 41. Here
5	Q. And No. 6, the same term appears in	5	paragraph 3, again it says if the Mission requires,
6	every contract, right?	6	you will submit yourself to a polygraph test. Do you
7	A. Yes.	7	see, correct? You consent to a polygraph test; is
8	Q. Let's go to Bates stamp No. 34, under	8	that right?
9		9	•
	paragraph 7, No. 8 and 9, the same terms how you will		A. Correct.
10	be evaluated, that's the same term that appears in	10	Q. Okay. And, all right, let's go to page
11	every other contract; is that right?	11	42. We're almost there.
12	A. Correct.	12	MR. ZHU: We're talking about D-6 right
13	Q. In fact, again and again every contract	13	now.
14	you signed reminds you of how important it is for you	14	Q. All right. I'd like to direct your
15	to keep the classified information secret; is that	15	attention to paragraph 2, No. 2. In this particular
16	right?	16	contract something new was added, that's protocols or
17	A. Correct.	17	ceremonial orders. Do you see that?
18	Q. Okay. You have never done anything in	18	A. Correct.
19	violation of this agreement willfully, right?	19	Q. And that means when the minister
20	A. Correct.	20	attends international events, and you have to comply
21	Q. You did your absolute best to comply	21	with the ceremonial orders or protocols that are
22	with the term, though, correct?	22	required for each event; is that right?
23	A. Correct.	23	A. Correct.
24	Q. Then let's go to document Bates stamped	24	Q. And your testimony is you faithfully
25	No. 36. The contract here you signed?	25	complied with every ceremonial order and protocols

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1 required for each event; is that right?	Page 78		Page 80
		1	MR. ZHU: I object to the form.
2 A. Correct.		2	Q. Okay. Let's go to the next question.
3 Q. And because it is important for	or you to	3	Now, 47, the same pledge agreement that you signed
4 keep that because you were part of the Missi	ion,	4	before; is that right?
5 correct?		5	A. Correct.
6 A. Correct.		6	Q. And paragraph 3 also requires I'm
7 Q. Now, I want to direct you to t	the next	7	sorry, strike that.
8 document.		8	Paragraph 3 also says that in case the
9 (Defendant's Exhibit 9, diction	onary	9	Mission requests, you would consent to voluntarily
10 definition of the protocols, was mark		10	submitting yourself to a polygraph test concerning
11 identification.)	1	11	paragraphs 1 and 2; is that correct?
12 MR. ZHU: For the record, it a	appears to 1	12	A. Correct.
13 be a Web printed document and contents four	pages. 1	13	Q. Okay. Now, in 2019, 2020 and 2021, do
14 Q. Okay. Mr. Nam, if you could	just I 1	14	you believe as you sit here today that you engaged in
15 want you to take a look at, just a quick loo	ok at what 1	15	any act that would violate the term that requires you
16 I just presented to you.	1	16	not to divulge any information you acquired during
17 A. Okay.	1	17	the course of your employment to anyone that's not
18 Q. Okay. Did you understand that	t? 1	18	authorized to know?
19 A. Yes.	1	19	MR. ZHU: Objection to the form.
20 Q. You understand the significant	ce of the 2	20	Q. Do you believe?
21 Korean word there, right?	2	21	A. I don't believe that.
22 A. Yes.	2	22	Q. Because you tried to keep all the terms
23 Q. Okay. Were you part of that of	ceremony 2	23	to the best of your ability?
24 when the minister attended event, meaning yo	ou gave 2	24	A. Correct.
25 him a ride?	2	25	Q. Now, when you drove for the minister or
	D 70		D 01
1 A. I only drove.	Page 79	1	Page 81 ministers, their safety was a very important concern
2 Q. Okay. And you waited until th	he	2	to you, was it not?
3 minister until the event was finished, co		3	A. Correct.
4 A. Correct.		4	Q. And, in fact, because of that you
5 Q. Did you also drive the ministe	er's	5	always operated the vehicle in a safe manner,
6 guests sometimes, counterparts, officers, th		6	correct?
7 invited to those events?		7	A. Correct.
8 A. Correct.		8	Q. And the ministers are very important
9 Q. Okay. And those guests are so		9	government officials in South Korea, right?
10 government officials, high government offici		10	A. Correct.
11 other countries?		11	Q. And since the safety of the ministers
12 A. Correct.		12	was important, did you sometimes check inside the car
13 Q. Did you also drive along with		13	to make sure that the car was in good condition?
14 Korea president's car and attend U.N. events		-3 14	A. Yes.
15 A. No.		15	Q. And did you always try to make sure
16 Q. Now, where are we? We're on t		16	that there are no trackers inside the car, there are
17 contract. We're on the 2021, Bates stamp No		17	no spying devices or anything like that inside the
18 Now, I want to direct your att		18	car?
19 paragraph 7, No. 8 and 9. These two terms a		19	MR. ZHU: Objection. Relevancy.
20 every contract you signed; is that correct?		20	You can answer.
21 A. Correct.		21	A. I only followed the instructions that I
22 Q. And No. 10 here, they ask you		22	was given. I was never given an instruction to do
23 the Mission in case you marry someone that's	-	23	that.
24 South Korean national; is that right?		24	Q. So I understand that. Did you or did
25 A. Correct.		25	you not in other words, did you sweep the car to
			and

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			1 ages 0205
1	Page 82 make sure that there is no device installed in your	1	Page 84 MR. ZHU: Objection to the form.
2	car?	2	MR. LIM: I haven't even asked. What
3	A. No.	3	are you objecting to?
4	Q. When you were at the Mission's building	4	MR. ZHU: You asked him yes, that he
5	waiting for the ministers' directions, did you	5	has to provide an answer.
6	perform any tasks or did you simply just wait at the	6	MR. LIM: No.
7	building, at the office?	7	Q. Mr. Nam, can you look me in the eye?
8	A. No, I simply waited.	8	You were not supposed to write down anything that
9	Q. You knew that the ministers that you	9	they discussed, correct? Nonetheless you wrote it
10	served, they were considered high level government	10	down, did you not?
11		11	· · · · ·
	officials inside Korea, right?		A. This is my diary.
12	A. Yes.	12	Q. Okay. Look, listen to my question.
13	Q. And now back in March 2018 you gave a	13	You were not allowed to write down any notes
14	ride to the secretary of U.N. secretary general,	14	concerning what these officials discussed,
15	right?	15	nonetheless you did so, did you not?
16	A. I would have to see my note to get the	16	MR. ZHU: Objection. It's harassment.
17	clear information.	17	Don't harass my client.
18	MR. KWAK: All right. This is Exhibit	18	A. Well, I had the right to.
19	10.	19	Q. You have the right. What right did you
20	(Defendant's Exhibit 10, document Bates	20	have and who gave you the right?
21	stamped P DOC S 000048, was marked for	21	MR. ZHU: Objection. Calls for legal
22	identification.)	22	conclusion.
23	Q. No question pending.	23	A. This was my journal.
24	All right. I want to direct your	24	(Discussion off the record.)
25	attention to your notes. I just handed to you the	25	(Defendant's Exhibit 11, document Bates
	Page 83		Page 85
1	exhibit that's been marked as D-10 which is your	1	stamped P DOC S 000272, was marked for
2	notes. All right. I want to direct your attention	2	identification.)
3	to the portion dated March 2nd. Do you see that,	3	BY MR. LIM:
4	sir?	4	Q. I want to direct your attention to
5	A. Yes.	5	Exhibit D-11. I want to direct your attention to the
6	Q. Okay. According to your note, the	6	portion of your memo dated October 13.
7	minister that you served at that time had a meeting	7	A. Okay.
8	with the secretary of U.N. secretary general; is that	8	Q. There you indicate who the minister
9	correct?	9	met, that is Mr. Seo Hoon. Do you see that?
10	A. Yes.	10	A. Yes.
11	Q. Okay. They had lunch together?	11	Q. That's your handwriting, right?
12	A. Yes.	12	A. Yes.
13	Q. And you gave a ride to both the	13	Q. You picked him up at JFK Airport,
14	minister and the secretary?	14	right?
15	A. Correct.	15	A. Yes.
16	Q. Okay. And they discussed something?	16	Q. And, in fact, Mr. Seo is the director
17	A. I don't remember what they discussed	17	of National Security Office to the South Korean
18	about.	18	president; is that right?
19	Q. Now, I'm looking at your notes. It	19	A. I don't know what the title is.
20	appears that you jotted down what they discussed. Do	20	Q. That's a counterpart of National
21	you see that?	21	Security Advisory in the United States?
22	A. You know, based on this memo it seems	22	MR. ZHU: Is there a question?
23	to me that this is what I heard but I don't know the	23	MR. LIM: I'm asking.
24	details about this particular conversation.	24	A. Okay. Yes.
25	Q. Mr. Nam?	25	Q. Now, I'm not going to get into the
	₹° aan s atomis		x. 100, 1 m 100 going to get into the

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 86..89

details, but in your memo you indicated where be 2 weard? 3		Tryumuy Nam on 02/22/2022 Tages 6069				
3	1		1	e		
4 international events where high ranking government 5 A. This is my diary. 6 Q. Where the national security advisor to 7 the president, where he went is your diary? 8 argumentative. 10 A. I'm allowed to write anything I want in 11 my diary. 12 Q. Did you tall anyone about this? 13 A. No, I've never told anyone about this? 14 The colly thing I did was to provide this diary 15 journal to my attorney. 16 Q. You did not tell anyone because you 17 thought it was important, correct, not to tell 18 anyone, right? 19 A. No, not because it was important. 20 Other than the private matter, I never recorded any 21 information in my journal. I am saying because this is in my private diary, this is where I decided to write is in my private diary, this is where I decided to write is my fournal to may attorney. 21 (Discussion off the record.) 22 (MR. LIM: Ckay. We're going to take a south Korea came here every year except for conce, right, since 2016 to 201? 23 A. Carrect. 24 (Discussion off the record.) 25 The five-minute break. 26 (Discussion off the record.) 27 (D. Now isn't it true that the president of the force who attended those events.) 28 A. Carrect. 29 Q. Now isn't it true that the president of the force who attended those events. 30 (Recess taken.) 31 (Recess taken.) 42 A. Carrect. 43 A. No. 54 A. No. 55 Q. Now isn't it true that the president of force who attended those events. 55 Q. Now isn't it true that the president of force who attended those events. 56 Q. That's not ny question. By question to varied the president of South Korea attended events. 57 Page 87 (Discussion of the ministers that you drove for attended some events if not all, some event that the president of South Korea attended events. 59 Q. Are you saying that the ministers hat you drove for attended some events if not all, some event that the president of South Korea attended events where the president of South Korea attended events. 50 Q. May. Have you strike that. 51 Q. Did you drive them so as you sit here today, your testimory under ca	2	went?	2	A. Not to my recollection.		
5 A. This is my diary. 6 Q. Where the national security advisor to the president, where he wett is your diary? 8 MR. ZHI: Objection. That's 7 A. No. 9 argamentative. 10 A. I'm allowed to write anything I want in 11 my diary. 11 my diary. 12 Q. Did you tall anyone about this? 13 A. No, I've never told anyone about this? 14 The only thing I did was to provide this diary 15 journal to my actorney. 15 journal to my actorney. 16 Q. You did not tell anyone because you 17 thought it was important, correct, not to tell 18 anyone, right? 19 A. No, not because it was important. 10 Ocher than the private matter, I never recorded any 21 information in my journal. I om saying because this 18 my private diary, this is where I decided to write 23 down the information and other than in my diary, I more divalged this information to anyone. 15 MR. LIN: Okay. We're going to take a 19 MR. LIN: Okay. We're going to take a 19 MR. LIN: Okay. We're going to take a 19 MR. LIN: Okay. We're going to take a 20 MR. LIN: Okay. We're going to take a 21 MR. ZHI: Objection. Foundation. 16 South Korea case here every year except for once, 7 right, since 2016 to 2021? 17 A. No. 18 MR. ZHI: Objection. Foundation. We're contract that the president of 5 MR. ZHI: Objection. Foundation. 6 MR. ZHI: Objection. Foundati	3	A. Yes.	3	Q. Did the ministers ever attend		
6 NR. ZEU: Cbjection. Foundation. 7 the president, where he went is your diary? 8 NR. ZEU: Cbjection. That's 9 argumentative. 9 argumentative. 10 A. I'm allowed to write anything I want in 11 my diary. 12 Q. Did you tell argume about this? 13 A. No. I've never told anyone about this? 14 The only thing I did was to provide this diary 15 journal to my atterney. 16 Q. You did not tell argume because you 17 thought it was important, correct, not to tell 18 argumentative. 19 A. No. Pot Decause it was important. 10 Other than the private matter. I never recorded any information in my journal. I am saying because this 2 is my private diary, this is where I decided to write 2 down the information and other than in my diary, I never divulged this information to anyone. 25 NR. LUB: Ckay. We're going to take a 26 worth remainate break. 27 (Discussion off the record.) 28 (Discussion off the record.) 39 (R. ZEU: Cbjection. Foundation. 40 (Discussion off the record.) 41 (Discussion off the record.) 42 (Discussion off the record.) 43 (BY NR. LUB: 45 Q. Now isn't it true that the president of 6 South Korea ceae here every year except for cone, 7 right, since 2016 to 2027 4 A. I wouldn't know because I was not part 10 of the force who attended those wents, 10 of the force who attended those wents, 11 of the week or no. Tending the week, 25 or more. 19 Q. And when the president attended events, 10 of the force who attended those wents, 11 of the president of South Korea attended? 10 Q. Tan't it true that ministers attended those events. However, I certainly did not attended those events. However, I cartainly did not attended those events. However, I cartainly did not attended events where the president of South Korea attended? 10 Q. Are you saying that the ministers never attended? 11 A. No. 12 No. 280 (Disection. Foundation. 19 Q. Are you saying that the ministers never attended? 20 A. No. 21 (Discussion of South Korea attended? 22 A. No. 23 A. No. 24 (Discussion of South Korea attended? 25 A. No. 26 (Discussion of South Korea	4	Q. Why did you do that?	4	international events where high ranking government		
the president, where he went is your diary? M. ARUD Objection. That's argumentative. A. I'm allowed to write anything I want in your diary. A. No. I'we never told anyone about this? In ever dividing I did was to provide this diary information in my journal. I am saying because this information in my journal. I am saying because this information in my journal. I am saying because this information in my journal. I am saying because this information in my journal. I am saying because this information in my journal. I am saying because this information in my journal. I am saying because this information in my journal. I am saying because this information in my journal. I am saying because this information in the private matter, I never recorded any information in my journal. I am saying because this information in my journal. I am saying bec	5	A. This is my diary.	5	officials from other states participated?		
argumentative. A I'm allowed to write anything I want in my diary. Did you tell argone about this? A No. I've never told argone about this? A No. I've never told argone about this? The only thing I did was to provide this diary thought it was important, correct, not to tell argone, right? A No, I've never told argone about this? The only thing I did was to provide this diary thought it was important, correct, not to tell argone, right? A No, not because it was important. Chier than the private matter, I never recorded any information in my journal. I am saying because this is a sweer all decided to write down the information and other than in my diary, I argument break. No. I'w as not really familiar with the schooled events. I just went or drove wherever I was told to go to. I miderated to United Nations General Assembly, right? In order than the private matter, I never recorded any information in my journal. I am saying because this is a sweer is decided to write down the information and other than in my diary, I argument to argument the previous of the record.) Chieveminute break. Page 87 I five-minute break. (Discussion off the record.) (Recess taken.) Recess taken.) Recess taken.) Recess taken.) No. I wouldn't know because I was not part of the force who attended those events. Chieveminute break and those events, or pight? A I wouldn't know because I was not part of the force who attended those events. A I wouldn't know because I was not part of the force who attended those events. A No. Or rect. A No. Or met it true that the president of the inisters that you drove for attended some events if not all, some event that the president of South Korea attended? A No. Or mat's not really familiar with the schedule events. I just the the decided to write a schedule events. I just the president of South Korea attended events. I just the president of South Korea attended events with the ministers have events. However, I certainly did not attended events with the ministers are event that t	6	Q. Where the national security advisor to	6	MR. ZHU: Objection. Foundation.		
a grumentative. A. I'm allowed to write anything I want in my diary. Q. Did you tell anyone about this? A. No, I've never told anyone about it. The only thing I did was to provide this diary journal to my attorney. D. You did not tell anyone because you thought it was important, correct, not to tell anyone, right? A. No, not because it was important. Other than the private matter, I never recorded any information in my journal. I am saying because this down the information and other than in my diarry, I right? The rever divulged this information to anyone. MR. LIN: Okay. We're going to take a Page 87 five-minute break. Page 87 five-minute break. Recess taken.) A. Correct. Q. Now isn't it true that the president of South Korea came here every year except for once, right, since 2016 to 2021? A. Correct. A. I wouldn't know because I was not part to think which with the scheduled events, correct? A. I was foot really familiar with the scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was scheduled events. I just went or drove wherever I was cheduled events. I just to be further to went related to	7	the president, where he went is your diary?	7	A. No.		
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11 A. A week that has important events scheduled. 2. In fact, this is related to United 13 A. No, I've never told anyone about tit. 14 The only thing I did was to provide this diary 15 journal to my attorney. 15 A. I was not really familiar with the scheduled events. I just went or drove wherever I thought it was important, correct, not to tell anyone, right? 18 A. No, not because it was important. 18 anyone, right? 18 A. No, not because it was important. 19 was told to go to. 19 Yes. 19 Y	9	argumentative.	9	A. Yes.		
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23 A. No. 24 Q. Okay. Have you strike that. 23 went to any of those events? Are you sure? 24 A. Now, I have never told I have never						
24 Q. Okay. Have you strike that. 24 A. Now, I have never told I have never						
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HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 90..93

	11yun	nuy Nam on	1 02/22/2022 1 ages 909.
1	driving people to. The only way I found out	Page 90 what 1	Page 92
2	kind of events were happening was through ne		
3	Q. Sir, see, now you're giving me		
4	narrative again. I'm just asking a simple q		
5	If you don't know, you don't know. Just say		
6	no. Okay?	6	
7	Now, you say you knew what the		
8	high-level week was. You said that. Now, d		
9	attend any event did the ministers attend	-	
10	event during the high-level week?	10	
11	MR. ZHU: Objection. Foundati		· -
12	A. I do not know.	12	
13	Q. Then how did you come to know		
14	high-level week was?	14	
15	A. From a newspaper.	15	•
16			
17	· · · · · · · · · · · · · · · · · · ·		
18	South Korea came, did you ever follow the mi to inspect the route the president of South		•
19	going to take?	Rorea was 10	
20	A. Well, prior to any event I was		•
21	told what type of event was going to take pl		•
22	long as I was told to drive them somewhere,		
23	followed that instruction and I drove them.	23	• • • • •
24			
25			
25	Okay? We're going to be here all day if you	keep 25	Q. Because you went to 56th Street?
		Page 91	Page 93
1	answering that way.		
2	Let me ask you this: Did you		• • • • • • • • • • • • • • • • • • • •
3	drive the ministers or did you ever drive fo		
4	ministers because the ministers had to inspe		
5	route that the president of South Korea was		
6	take when he came here?	6	1 1 1 1 1 1 1 1 1 1
7	MR. ZHU: Objection. Foundati		.
8	A. I don't know because I was nev		
9	explained what my task was prior to being as		_
10	a task.	10	
11	Q. I see. Do you remember D-8?	11	•
12	A. Yes.	12	-
13	Q. You testified earlier that thi		3 1 1
14	you wrote down, right?	14	3 ,
15	A. Correct.	15	"
16	Q. Everything in there, right?	16	-
17	A. Well, I was told what and how		
18	it by the minister, so I followed that instr		
19	Q. Sir, again, don't give me the	19	-
20	narrative. I'm asking you did you write it		5-
21	that's my question. Yes or no?	21	2
22	A. Yes.	22	A. I can't recall it but it wasn't VIP.
23	Q. Okay. Now, everything in here		•
24	wrote it down, correct, meaning that's your	24	term VIP refers to someone else other than the
25	handwriting?	25	president?

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 94..97

	ily difficult in the second of		1 uges >4.1.21
1	Page 9 A. No. At the time I really was not	4 1	Page 96 Q. Okay. Now, do you know whether or not
2	interested in anything like this. I just drove when	2	these other drivers drove for your ministers?
3	I was asked to drive.	3	A. As far as I know, no.
4	Q. In fact, you got a security clear pass	4	Q. Have you spoken with any of them since
5	to attend, to access the events during the high-level	5	you left the Mission?
6	week, correct?	6	MR. ZHU: Objection. Relevancy.
7	MR. ZHU: Objection. Time frame.	7	A. No, never.
8	A. Correct.	8	Q. And these drivers, the four drivers
9	Q. All right. You know that the Mission	9	that we did not name, these drivers, their primary
10	spends months to prepare for the U.N. General	10	responsibility was to pick up diplomatic pouches or
11	Assembly events, right?	11	bags from the airport, right?
12	A. Like I said before, other than driving	12	MR. ZHU: Objection. Foundation.
13	for people who needed the transportation, other than	13	A. I wouldn't know.
14	that, I was not privied to other information or not	14	Q. But you didn't do any of this, right,
15	interested in other information.	15	picking up diplomatic pouch and bags from the
16	Q. Okay. Did you ever scout the U.N.	16	airport?
17	vicinity and president's route with the ministers?	17	A. That's correct.
18	In other words, when the ministers performed this	18	Q. In fact, you went to the airport by
19	duty, did you give them a ride?	19	yourself if the ministers were not available to pick
20	A. Now, in the five years that I worked	20	up ministers' guests at the airport, right?
21	for the Mission, I was never given a schedule for	21	A. Never.
22	that day or the purpose of my task. What I was	22	Q. Never?
23	privied to was once people got into my car, I would	23	A. Correct.
24	be told what the immediate destination is but then I	24	Q. You always
25	wouldn't be told if there are other further	25	A. It was always with somebody in the car.
			· · ·
1	Page 9 additional destinations. So only when people get	5 1	Page 97 Q. Okay. Government officials?
2	into my car, that's when I will know where I should	2	A. Correct.
3	be taking them.	3	Q. Okay. Do you know whether or not these
4	Q. I understand. But do you know at the	4	drivers that we did not name, did they have a
5	Mission there were other drivers besides you?	5	designated vehicle like you did?
6	A. A lot.	6	A. I don't know.
7	Q. About four or five drivers?	7	Q. Do you know whether or not these
8	A. Yes.	8	drivers signed the same pledge agreement as you did?
9	Q. And there was one driver for the	9	A. I don't know that either.
10	ambassador?	10	Q. Do you know whether or not these
11	A. Correct.	11	drivers signed the employment contracts like you did?
12	Q. I'm not going to name who they are but	12	A. I don't know.
13	there are about four Korean drivers?	13	Q. Do you know whether or not these
14	A. Correct.	14	drivers went through a security clearance like you
15	Q. Okay. And they were on rotation to	15	did?
16	drive official vehicles, any official vehicle	16	MR. ZHU: I'll object to this line of
17	available at the Mission, correct?	17	question as to relevance.
18	MR. ZHU: Objection to the form.	18	A. I don't know.
	·	19	
19 20	A. No.		Q. Other than your counsel, did you
	Q. Are you telling me that they drove your		disclose or divulge any information you had learned
21 22	vehicle? You already testified that they never drove	21 22	or acquired through the course of employment at the
23	your vehicle. Now with regard to the car that I	23	Mission to your CPA or other professionals?
	A. Now, with regard to the car that I		A. No.
24	drove, no one else drove it because it was designated		Q. Now, you knew that according to South
25	to me.	25	Korean laws you were to retire at the age of 60,

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 98..101

1 2		Page 98	3	Page 100
١	correct?		1	employment, correct? Yes or no?
4	A.	Well, as far as under the Korean law	2	A. Yes.
3	with regard t	o the short-term, for an employee who	3	Q. In fact, you told him that because of
4	_	ort-term contract, there is no age limit	4	the pandemic your wife is out a job, you cannot find
5	as far as the		5	a job, so you asked the Mission to extend your
6	Q.	Sir, here is my question: When you	6	employment beyond 60 years old?
7	-	for the Mission, isn't it true that Mr.	7	MR. ZHU: Objection. Asked and
8	_	you would have to retire at the age of	8	answered.
9	_	to Korean law?	9	A. No.
10	А.	He didn't.	10	Q. Your wife had a job at the time?
11	0.	Did anybody ever tell you that you	11	A. No, she lost her job due to the
12	~	at the age of 60 according to South	12	pandemic.
13	Korean law?		13	Q. I understand in 2020 during the
14		MR. ZHU: Objection. Asked and	14	pandemic you could not find a job elsewhere, correct?
15	answered.		15	A. Correct.
16	A.	That was Mr. Lee.	16	Q. So you asked the Mission to extend the
17	Q.	You mean the Minister Lee?	17	employment and they did, right?
18	Α.	Correct.	18	MR. ZHU: Objection. Asked and
19	Q.	That's back in 2018?	19	answered.
20	Α.	As far as I can remember, I believe it	20	Q. Correct?
21	was in 2019.	The rain and I don't continue to the rain and the rain an	21	A. Yes.
22	Q.	Okay. In 2019, how old were you? Were	22	Q. In fact, in order for you to get the
23	you 58?	0.112,	23	extension, the Mission had to get permission from
24	A.	What was the year?	24	Korea, right?
25	Q.	Or 59, right?	25	MR. ZHU: Objection. Foundation.
	٠.	01 55, 115110.	23	Tax. End. Ox jeotron. Foundation.
1	Α.	Page 99 We're talking about 2019, right?	1	Page 101 A. Well, at the time Mr. Jo made requests
2	Q.	Correct.	2	and I complied with those requests. However, later
3	ν. Α.	Yes.	3	on I found out those requests were not honest or
4	Q.	In fact, in 2019 you signed two	4	truth, so that's why I objected.
5		stracts, right?	5	Q. Are you saying that the Mission never
6	A.	Correct.	6	contacted Korea to extend your employment?
7		One was for a period of two or three	7	A. Well, I don't know that for sure,
8	Q. months?	one was for a period of two or direc	8	however, at the time he told me that in order for my
		Welve talking about 2010 right?		employer to extend my employment, I was supposed to
9	Α.	We're talking about 2019, right?	9	
10	Q.	Yep.	10	follow a certain procedures.
11 12	A.	No, in 2019 I only signed one one-year	11	Q. I understand that. That's not my
	contract.	And your bogome 60 cld in 20000	12	question. My question is this: You were told in
13	Q.	And you became 60 years old in 2020?	13	2019 that you had to retire at the age of 60,
14	Α.	Correct.	14	correct?
15	Q.	And when you became when you turned	15	A. Correct.
16		the Mission told you that according to	16	Q. And you asked for an extension,
17	south Korean	law, you have to retire?	17	correct?
18	•	MR. ZHU: Objection.	18	A. Correct.
19	Q.	Correct?	19	Q. And they granted you an extension about
20	-	MR. ZHU: Is there a question?	20	14 months after they got permission from Korea; is
21	Α.	Yes.	21	that right?
22	Q.	And then you then asked Mr. Jo who is	22	MR. ZHU: Objection. Foundation.
	sitting here	today because of the pandemic you could	23	A. Correct.
23				
23 24 25		b elsewhere, therefore you asked the tend your employment to extend the	24 25	Q. And, in fact, they told you that in order to make an exception for you, they had to get

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 102..105

Page 102 1 permission from Korea, correct? 2 A. Correct. 3 Q. In fact, they because you pled with 4 them that you could not find a job during the 5 pandemic, you said you need more time, correct? Yes 6 or no? 7 A. Yes. 8 Q. Okay. And it took a few months to get 9 permission from Korea to extend your employment, 9 your employment ends on June 30, 202	
A. Correct. Q. In fact, they because you pled with them that you could not find a job during the pandemic, you said you need more time, correct? Yes pandemic, you said you need more time, correct? Yes Pandemic, you said you need more time, correct? Yes Pandemic, you said you need more time, correct? Yes Pandemic, you said you need more time, correct? Yes Pandemic, you said you need more time, correct? Yes Pandemic, you said you need more time, correct? Yes Pandemic, you said you need more time, correct? Yes Pandemic, you said you need more time, correct? Pandemic, you said you need more time, co	
Q. In fact, they because you pled with them that you could not find a job during the pandemic, you said you need more time, correct? Yes represented by the pandemic, you said you need more time, correct? Yes represented by the pandemic, you said you need more time, correct? Yes represented by the pandemic, you said you need more time, correct? Yes represented by the pandemic, you were represented by the pandemic by th	
4 them that you could not find a job during the 5 pandemic, you said you need more time, correct? Yes 6 or no? 6 Q. And according to this are not allowed or you agreed, you as 8 Q. Okay. And it took a few months to get 9 permission from Korea to extend your employment, 9 your employment ends on June 30, 202	fold that you had
5 pandemic, you said you need more time, correct? Yes 5 A. Correct. 6 or no? 6 Q. And according to this so 7 A. Yes. 7 are not allowed or you agreed, you as 9 permission from Korea to extend your employment, 9 your employment ends on June 30, 202	ora and you mad
6 or no? 7 A. Yes. 8 Q. Okay. And it took a few months to get 9 permission from Korea to extend your employment, 9 your employment ends on June 30, 202	
7 A. Yes. 7 are not allowed or you agreed, you as 8 Q. Okay. And it took a few months to get 8 assert any claims with respect to you 9 permission from Korea to extend your employment, 9 your employment ends on June 30, 202	arroament trou
8 Q. Okay. And it took a few months to get 8 assert any claims with respect to yo 9 permission from Korea to extend your employment, 9 your employment ends on June 30, 202	
9 permission from Korea to extend your employment, 9 your employment ends on June 30, 202	
	Lf
10 correct? 10 A. Correct.	
11 A. Correct. 11 Q. And after you signed to	
12 Q. Now, and for that you signed a 12 you signed this, you assured the emp	
13 contract? 13 Mission that you would abide by this	agreement,
14 A. Yes. 14 correct?	
15 Q. Now, and one of the requirements that 15 A. Well, once I signed th	
16 you had to comply with or that Mission requested was 16 someone took this document. I was n	-
17 in order for you to get an extension of your 17 given a copy, so it took about six m	onths for me to
18 employment was to sign an agreement that you're not 18 get a copy.	
19 going to assert any claims with respect to your 19 Q. I understand that. Yo	got a copy of
20 termination at the Mission, correct? We're going to 20 it. And at the time you signed this	, you had every
21 ask you the questions. Just answer my question. 21 intention in good faith to abide by	this agreement,
22 Correct? 22 correct?	
23 A. Correct. 23 A. My understanding was t	nat this
24 Q. Okay. Now, while we're waiting for an 24 agreement would extend my employment	for one year.
25 exhibit, while you worked at the Mission, you saw 25 Q. I understand that. So	according to
Page 103	Page 105
1 other people retiring from their job when they 1 Korean law you're supposed to retire	
2 reached the age of 60? 2 employment was extended until June 3), 2021, correct?
3 A. Never. 3 A. No, that's wrong.	
5 11 110, 0100 5 112013.	
4 Q. You never saw anyone? 4 Q. What is wrong?	
	who signs a
4 Q. You never saw anyone? 4 Q. What is wrong?	•
4 Q. You never saw anyone? 4 Q. What is wrong? 5 A. No, I didn't see anyone who retired at 5 A. Well, for an employee	employee who
4 Q. You never saw anyone? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 6 yearly contract is not subject an	employee who
4 Q. What is wrong? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 7 the age of 62 and another person retiring at the age 7 signs a yearly contract is not subject an 7 signs a yearly contract is not subject	employee who
4 Q. What is wrong? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 7 the age of 62 and another person retiring at the age 8 of 61. 4 Q. What is wrong? 5 A. Well, for an employee of yearly contract is not subject an 7 signs a yearly contract is not subject 8 age.	employee who at to retirement mestion.
4 Q. You never saw anyone? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 7 the age of 62 and another person retiring at the age 8 of 61. 9 Q. What is wrong? 5 A. Well, for an employee of yearly contract is not subject an of signs a yearly contract is not subject subject of 61. 8 age. 9 Q. Okay. That's not my quarks of signs and yearly contract is not subject of yearly contract is not yearly contract.	employee who ct to retirement mestion. According to this
4 Q. You never saw anyone? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 7 the age of 62 and another person retiring at the age 8 of 61. 9 Q. In this case, you're retired or 10 separated from the Mission at the age of 61 because 4 Q. What is wrong? 5 A. Well, for an employee of yearly contract is not subject an 7 signs a yearly contract is not subject an 8 age. 9 Q. Okay. That's not my q	employee who ct to retirement mestion. According to this end not to assert
4 Q. You never saw anyone? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 7 the age of 62 and another person retiring at the age 8 of 61. 9 Q. In this case, you're retired or 10 separated from the Mission at the age of 61 because 11 of extension, correct? 4 Q. What is wrong? 5 A. Well, for an employee of yearly contract is not subject an of yearly contract is not yearly contract is not yearly contract.	employee who ct to retirement mestion. According to this end not to assert
4 Q. You never saw anyone? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 7 the age of 62 and another person retiring at the age 8 of 61. 9 Q. In this case, you're retired or 10 separated from the Mission at the age of 61 because 11 of extension, correct? 12 A. Correct. 4 Q. What is wrong? 5 A. Well, for an employee of 6 yearly contract is not subject an 7 signs a yearly contract is not subject an 8 age. 9 Q. Okay. That's not my question is this: 11 contract when you signed it, you agree any claims related to your employment.	employee who ct to retirement destion. According to this ded not to assert that the Mission,
4 Q. You never saw anyone? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 7 the age of 62 and another person retiring at the age 8 of 61. 9 Q. In this case, you're retired or 10 separated from the Mission at the age of 61 because 11 of extension, correct? 12 A. Correct. 13 Q. Okay. Now, we're going to introduce 14 Q. What is wrong? 5 A. Well, for an employee of expearly contract is not subject and of yearly contract is not subject and of yearly contract is not subject and of extension at the age of 61 because 10 My question is this: 10 My question is this: 11 contract when you signed it, you agont 12 any claims related to your employment 13 correct?	employee who ct to retirement destion. According to this ded not to assert that the Mission,
4 Q. What is wrong? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 7 the age of 62 and another person retiring at the age 8 of 61. 9 Q. In this case, you're retired or 10 separated from the Mission at the age of 61 because 11 of extension, correct? 12 A. Correct. 13 Q. Okay. Now, we're going to introduce 14 that exhibit. 4 Q. What is wrong? 5 A. Well, for an employee of 6 yearly contract is not subject an 7 signs a yearly contract is not subject an 9 Q. Okay. That's not my question is this: 10 my question is this: 11 contract when you signed it, you ago any claims related to your employment 13 correct? 14 that exhibit. 15 A. Well, for an employee of 6 yearly contract is not subject an 7 signs a yearly contract is not subject an 9 Q. Okay. That's not my question is this: 11 contract when you signed it, you ago any claims related to your employment 13 correct? 16 A. Well, for an employee of 9 yearly contract is not subject an 7 signs a yearly contract is not subject an 9 Q. Okay. That's not my question is this: 12 contract when you signed it, you ago any claims related to your employment 13 correct? 17 MR. ZHU: Objection.	employee who ct to retirement mestion. According to this med not to assert that the Mission, at the Mission,
4 Q. You never saw anyone? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 7 the age of 62 and another person retiring at the age 8 of 61. 9 Q. In this case, you're retired or 10 separated from the Mission at the age of 61 because 11 of extension, correct? 12 A. Correct. 13 Q. Okay. Now, we're going to introduce 14 that exhibit. 15 MR. KWAK: Exhibit 12. 16 Q. What is wrong? 17 A. Well, for an employee of expearly contract is not subject an of expearly contract is not subject	employee who ct to retirement mestion. According to this med not to assert that the Mission, at the Mission,
4 Q. You never saw anyone? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 7 the age of 62 and another person retiring at the age 8 of 61. 9 Q. In this case, you're retired or 10 separated from the Mission at the age of 61 because 11 of extension, correct? 12 A. Correct. 13 Q. Okay. Now, we're going to introduce 14 that exhibit. 15 MR. KWAK: Exhibit 12. 16 (Defendant's Exhibit 12, Settlement) 17 Q. Okay. Just answer my on the age of Q. Okay. In this age of Q. Okay. Just answer my on the age of Q. Okay. In the age of Q	employee who ct to retirement destion. According to this ded not to assert to at the Mission, att's not a fair question.
4 Q. You never saw anyone? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 7 the age of 62 and another person retiring at the age 8 of 61. 9 Q. In this case, you're retired or 10 separated from the Mission at the age of 61 because 11 of extension, correct? 12 A. Correct. 13 Q. Okay. Now, we're going to introduce 14 that exhibit. 15 MR. KWAK: Exhibit 12. 16 (Defendant's Exhibit 12. 17 Agreement, was marked for identification.) 18 MR. ZHU: I'll put on the record I'll 18 Q. What is wrong? A. Well, for an employee of yearly contract is not subject and results of yearly	employee who ct to retirement mestion. According to this med not to assert that the Mission, It's not a fair muestion.
4 Q. You never saw anyone? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 7 the age of 62 and another person retiring at the age 8 of 61. 9 Q. In this case, you're retired or 10 separated from the Mission at the age of 61 because 11 of extension, correct? 12 A. Correct. 13 Q. Okay. Now, we're going to introduce 14 that exhibit. 15 MR. KWAK: Exhibit 12. 16 (Defendant's Exhibit 12. 16 (Defendant's Exhibit 12. 17 Agreement, was marked for identification.) 18 MR. ZHU: I'll put on the record I'll 19 object to you introducing the settlement agreement 19 A. My understanding of the	employee who ct to retirement destion. According to this end not to assert that the Mission, It's not a fair question. Programment is
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4 Q. You never saw anyone? 5 A. No, I didn't see anyone who retired at 6 the age of 60. However, I saw someone retiring at 7 the age of 62 and another person retiring at the age 8 of 61. 9 Q. In this case, you're retired or 10 separated from the Mission at the age of 61 because 11 of extension, correct? 12 A. Correct. 13 Q. Okay. Now, we're going to introduce 14 that exhibit. 15 MR. KWAK: Exhibit 12. 16 (Defendant's Exhibit 12. 16 (Defendant's Exhibit 12. 17 Agreement, was marked for identification.) 18 MR. ZHU: I'll put on the record I'll 19 object to you introducing the settlement agreement 20 since it's already been concluded by the Court. 21 MR. LIM: There was a pre-answer 22 motion. 4 Q. What is wrong? 5 A. Well, for an employee of yearly contract is not subject an signs a yearly contract is not subject an signs a yearly contract is not subject an signs a yearly contract is not subject on signs a yearly contract is not subject an sign	employee who ct to retirement destion. According to this end not to assert t at the Mission, It's not a fair question. It's agreement is one-year of type of claims. Exparated from the
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HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 106..109

		Hyunnuy Nan		0_,,	1 ages 100109
1	Q.	Page 106 Now, because of your separation from	1	Q.	Page 108 Mr. Nam, did the doctor tell you that
2	the Mission,	did you ever have to see a doctor or	2	your symptoms	s are related to your work experience at
3	take any med	ication?	3	the Mission?	Did he say that?
4	A.	Yes.	4	A.	No.
5	Q.	Okay. What's the name of the doctor?	5	Q.	Did you take any medication afterwards?
6	A.	Dr. Haeyang Chung.	6	A.	No.
7	Q.	What kind of doctor is he?	7	Q.	Is there any professional that you can
8	A.	Internal.	8	produce in th	nis case that will testify for you that
9	Q.	Internist?	9	your medical	conditions, your alleged medical
10	A.	Yes.	10	conditions ar	re related to your experience at the
11	Q.	And did the doctor diagnose you that	11	Mission?	
12	whatever cond	dition strike that.	12		MR. ZHU: Objection. It calls for a
13	(REQ)	MR. LIM: We're going to make a request	13	legal conclus	sion and is subject to discovery.
14	for the produ	action of medical records. We'll send	14	A.	No.
15	you a medica	l authorization so you can sign off ON it	15	Q.	Other than the one occasion you
16	and produce	the medical records.	16	described, di	d you see the doctor afterwards?
17		MR. ZHU: We'll take it under	17	A.	Yes.
18	advisement.		18	Q.	Is it related to your work experience
19	BY MR. LIM:		19	at the Missic	on?
20	Q.	So, now, Mr. Nam, where is the doctor	20	A.	Yes, that's what I believe. So because
21	in Jersey or	New York?	21	I didn't get	a clear answer from Dr. Chung, I went
22	A.	New Jersey.	22	for a second	opinion.
23	Q.	Where is his office?	23	Q.	Who is that second opinion?
24	A.	On Broadway, Palisades Park.	24	A.	It was a non-Korean doctor.
25	Q.	And when was the first time you saw	25	Q.	What's the name of the doctor?
		Page 107			Page 100
1	this doctor?	Page 107	1	A.	Page 109 I don't remember because it was not a
2	A.	I believe it was in or around June 20,	2	Korean name.	
3	2021.		3	Q.	What kind of doctor is he?
4	Q.	That was the first time you saw this	4	A.	I believe he was a general medicine.
5	doctor?		5	Q.	Okay. When did you see him?
6	A.	Correct.	6	A.	In August.
7	Q.	Did you see any other doctor other than	7	Q.	2000 what, '21?
8	this one?		8	A.	Yes.
9	A.	No.	9	Q.	What did you do?
10	Q.	Okay. And what did the doctor tell	10	A.	Blood tests, EKG.
11	you? Strike	that.	11	Q.	Okay. Did he tell you that whatever
12	_	What are the symptoms that caused you	12	symptoms you	had at the time are related to your job
13	to go see th	is doctor?	13		the Mission?
14	Α.	I get depression. Couldn't get a good	14	А.	No, the doctor didn't say that.
15	night sleep,	anxiety and loss of motivation.	15	However, I di	d explain my symptoms to my doctor.
16	Q.	So if I look at your doctor's records,	16	Q.	What's the address of this doctor?
17		ow what you just testified?	17	A .	Can I look at my phone?
18	Α.	I don't know but the doctor gave me a	18	Q.	Please.
19		s to have done. However, at the time my	19	~	MR. KWAK: And if you can look for the
20		rance was about to end, so because of the	20	name too, ple	-
21		tuation, I didn't.	21	Α.	No, I can't find the name of the
22	Q.	What are the tests that he recommended	22		ry, I don't have the doctor's address
23	that you unde		23	stored in my	
24	Α.	Well, lung and heart test and endoscopy	24	Q.	Do you know the town by any chance?
25	and colonosco		25	Α.	West New York.

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 110..113

Page 110 1 Q. The name, please? 2 A. I can't find it. 3 Q. Okay. Now, any other doctor that you 4 can name? 5 A. So, in August I didn't get an answer 6 from my second doctor, so I went back to Dr. Chung in 7 December. 8 Q. Okay. And did the doctor tell you that 9 whatever symptoms you had at the time were caused by 10 or related to your experience at the Mission? 11 A. I never talked about my work with the 12 doctor. I only explained what my symptoms were. 13 Q. Okay. We're going to take a 14 five-minute bathroom break. I'll be right back. 15 A. I can't find it. 2 Q. In fact, you cannot cond to disclose the information that has to disclose the information that has confidential or top secret or classing. 4 confidential or top secret or classing. 5 Do you understand that, sir? 6 A. I do. 7 Q. If you violate that, to legal consequences. 9 A. Okay. 10 Q. Now, let's come back to not going to go over everything and not going to go over everything and a new read the statement that you made new a classing. 14 THE INTERPRETER: May	s been deemed ified information. There will be some to this note. I'm I want you to
A. I can't find it. Q. Okay. Now, any other doctor that you 4 can name? A. So, in August I didn't get an answer 5 from my second doctor, so I went back to Dr. Chung in 7 December. Q. Okay. And did the doctor tell you that 9 whatever symptoms you had at the time were caused by 10 or related to your experience at the Mission? 11 A. I never talked about my work with the 12 doctor. I only explained what my symptoms were. 13 Q. Okay. We're going to take a 2 Q. In fact, you cannot co 3 to disclose the information that has 4 confidential or top secret or classic 6 from my second doctor, so I went back to Dr. Chung in 6 A. I do. 7 Q. If you violate that, to 8 legal consequences. 9 A. Okay. 10 Q. Now, let's come back to 11 not going to go over everything and 12 read the statement that you made not provided in the statement of the poing to go over everything and 13 A. "I worked as a chauffer	s been deemed ified information. There will be some to this note. I'm I want you to
Q. Okay. Now, any other doctor that you 4 can name? 5 A. So, in August I didn't get an answer 6 from my second doctor, so I went back to Dr. Chung in 7 December. 8 Q. Okay. And did the doctor tell you that 9 whatever symptoms you had at the time were caused by 10 or related to your experience at the Mission? 11 A. I never talked about my work with the 12 doctor. I only explained what my symptoms were. 13 Q. Okay. We're going to take a 3 to disclose the information that has confidential or top secret or classis. 4 confidential or top secret or classis. 5 Do you understand that, sir? 6 A. I do. 7 Q. If you violate that, to legal consequences. 9 A. Okay. 10 Q. Now, let's come back to Dr. Chung in 11 Doctors and Doctor tell you that legal consequences. 12 read the statement that you made new that	s been deemed ified information. There will be some to this note. I'm I want you to
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5 A. So, in August I didn't get an answer 6 from my second doctor, so I went back to Dr. Chung in 7 December. 7 Q. If you violate that, to 8 Q. Okay. And did the doctor tell you that 9 whatever symptoms you had at the time were caused by 10 or related to your experience at the Mission? 11 A. I never talked about my work with the 12 doctor. I only explained what my symptoms were. 13 Q. Okay. We're going to take a 15 Do you understand that, sir? 6 A. I do. 7 Q. If you violate that, to 8 legal consequences. 9 A. Okay. 10 Q. Now, let's come back to 11 not going to go over everything and 12 read the statement that you made not go over the stat	chere will be some
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7 Q. If you violate that, to 8 Q. Okay. And did the doctor tell you that 9 whatever symptoms you had at the time were caused by 10 or related to your experience at the Mission? 10 Q. Now, let's come back to 11 A. I never talked about my work with the 11 not going to go over everything and 12 doctor. I only explained what my symptoms were. 12 read the statement that you made next 13 A. "I worked as a chauffer of the statement that you made next 15 A. "I worked as a chauffer of the statement that you made next 16 A. The statement that you made next 17 A. The statement that you made next 18 A. "I worked as a chauffer of the statement that you made next 19 A. The statement tha	to this note. I'm I want you to
8 Q. Okay. And did the doctor tell you that 9 whatever symptoms you had at the time were caused by 10 or related to your experience at the Mission? 11 A. I never talked about my work with the 12 doctor. I only explained what my symptoms were. 13 Q. Okay. We're going to take a 14 legal consequences. 9 A. Okay. 10 Q. Now, let's come back to not going to go over everything and read the statement that you made now	to this note. I'm I want you to
9 whatever symptoms you had at the time were caused by 10 or related to your experience at the Mission? 11 A. I never talked about my work with the 11 not going to go over everything and 12 doctor. I only explained what my symptoms were. 13 Q. Okay. We're going to take a 14 A. "I worked as a chauffe	I want you to
10 or related to your experience at the Mission? 11 A. I never talked about my work with the 12 doctor. I only explained what my symptoms were. 13 Q. Okay. We're going to take a 10 Q. Now, let's come back to not going to go over everything and 12 read the statement that you made new 13 A. "I worked as a chauffed statement that you made new 13 A."	I want you to
11 A. I never talked about my work with the 11 not going to go over everything and 12 doctor. I only explained what my symptoms were. 12 read the statement that you made new 13 A. "I worked as a chauffe	I want you to
12 doctor. I only explained what my symptoms were. 12 read the statement that you made new 13 A. "I worked as a chauffe	_
13 Q. Okay. We're going to take a 13 A. "I worked as a chauffe	r+ +0 No 2
	IL LO NO. 3.
14 five-minute bathroom break. I'll be right back. 14 THE INTERPRETER: May	eur to"
3	the interpreter
15 (Recess taken.) 15 ask one word, please?	
16	nicle, you already
notes, was marked for identification.) 17 translated.	
18 MR. KWAK: I'm going to give him the 18 A "and I drove the of	ficial vehicle.
19 marked copy for now. He'll use that and at the end 19 I was not a personal driver."	
20 of the day, we'll take the original back. 20 Q. Okay. In fact, that's	your testimony
21 BY MR. LIM: 21 throughout the proceeding today?	
22 Q. Mr. Nam, we marked your handwritten 22 A. Correct.	
23 notes D-13. 23 Q. Okay. And how about t	the next?
24 A. Okay. 24 A. "Because I did not red	ceive any specific
25 Q. These are the notes that you took 25 security related training, it's difference are the notes that you took	icult for me to
Page 111	Page 113
1 during the course of deposition today, right? 1 answer specific questions."	1 mgv 110
2 A. Yes. 2 Q. That's the note that y	ou made for
3 Q. And I'm going through, if you could 3 yourself, correct?	
4 just read the first line to the translator so the 4 A. Correct.	
5 translator can translate for us, let's do that. 5 Q. So you were going to a	answer according
6 A. Now, with regards to the first 6 to this quote guideline?	
7 paragraph that you see at the top of the paper, I had 7 A. No. After that is dep	position was over,
8 originally written this before I came to deposition 8 I didn't want to forget about the de	ep today, so I
9 today in order to remind myself how to or how not to 9 made a note to remind myself.	
10 answer. So when I wanted to talk about this with my 10 Q. Once again, I'm going	to we marked
11 attorney, my attorney stopped me from speaking with 11 it but don't discuss certain information	ation with anyone
12 him about it during the deposition. So, other than 12 outside of this litigation, please.	
13 that, the other paragraphs below that are the 13 MR. ZHU: Objection.	No question
14 subjects that came out today which I hadn't discussed 14 pending.	
15 prior to today, so I decided to write a note. 15 A. Understood.	
16 Q. Okay. What was your intention in 16 Q. That includes your fri	iends, okay? Do
17 taking these notes? Were you going to send this to 17 you understand that, sir?	
18 someone else outside of this proceeding? 18 A. Yes.	
19 A. No, just to remind myself. 19 Q. After you left the Mis	ssion, you were
20 Q. Mr. Nam, I just have to respectfully 20 supposed to be paid a severance acco	ording to South
21 remind you of the confidentiality order signed by 21 Korean law, correct?	
22 Judge Nathan and the pledge agreements you signed. 22 A. Correct.	
23 A. Yes. 23 Q. In fact, the Mission of	offered to pay you
24 Q. You are not allowed to talk to anyone 24 a severance according to the South F	
25 not authorized to know certain information. 25 calculation, correct?	

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 114..117

	Tryumuy Nai		
1	Page 11. A. Correct.	1	Page 116 come and pick up the check for the severance?
2	Q. In fact, you did not come and pick up	2	A. No.
3	the check, correct? Yes or no?	3	Q. Never?
4	A. I did, once.	4	A. Correct, no.
5	Q. When did you come to pick up the check?	5	Q. And your testimony is as you sit here
6	A. I believe it was in or around June	6	today I want to pick up the check but I was advised
7	29th.	7	not to pick up the check?
8	Q. June 29, 2021?	8	MR. ZHU: Objection to the form.
9	A. Yes.	9	Q. Is that right?
10	Q. Okay. What time did you come?	10	A. Well, I was never advised not to do
11	A. Around 11 a.m.	11	that. However, I was told that the severance pay
12	Q. Okay. Who did you talk to?	12	would be paid in check. However, I didn't end up
13	A. Mr. Chung and Mr. Kim.	13	receiving one.
14	Q. And at the time you were not even	14	Q. Again, now, listen to me. So you were
15	terminated by the Mission?	15	told by someone at the Mission to pick up the check
16	A. Correct.	16	for the severance, correct? Yes or no?
17	Q. So it's not that you came to pick up	17	A. No.
18	the check after you left the Mission, you were still	18	Q. Never?
19	working for the Mission at the time, correct?	19	A. No.
20	A. Correct.	20	Q. So no one ever told you to receive a
21	Q. So, now, are you saying that at the	21	check for severance?
22	time you were still working at the Mission, the	22	MR. ZHU: Objection. Asked and
23	Mission offered you a severance?	23	answered.
24	A. I was told to visit the Mission because	24	A. Correct.
25	they wanted to talk to me about something.	25	MR. LIM: We're going to mark an
	Page 11:		Page 117
1	Q. Okay. And you just testified that you	' ₁	exhibit. Just wait. We're going to print it out.
2	came to pick up the check for the severance, correct?	2	(Pause in the proceedings.)
3	A. That's what I was thinking. I was	3	(Defendant's Exhibit 14, text messages,
4	thinking maybe they are trying to give me a check for	4	were marked for identification.)
5	the severance pay.	5	MR. LIM: All right. Let's show him
6	Q. Okay. My question is this: Did anyone	6	D-14.
7	tell you at the time that you would pick up the	7	BY MR. LIM:
8	check, you would be paid severance today on June 28th	8	Q. Mr. Nam, I just presented to you what's
9	or June 29th?	9	been marked as D-14. These are the text messages
10	A. No.	10	that you exchanged with Mr. Kim who is present in
11	Q. So then listen to my question, sir.	11	this proceeding today.
12	After you left the Mission, did anyone offer you a	12	MR. ZHU: Put on the record our
13	severance, yes or no?	13	objection. This document was not produced any time
14	A. I mean, there was no specific	14	before today.
15	instruction as to when the check was going to be	15	MR. LIM: It's for impeachment purposes
16	paid, however, there was a discussion about how it	16	only. So we can go ahead.
17	was going to be paid.	17	Q. Now, Mr. Nam, you recognize these text
18	Q. Okay. And, in fact, isn't it true that	18	messages, correct?
19	Mr. Jo sitting here today contacted you via Kakao	19	A. Yes.
20	Talk asking you to come and pick up the check for the	20	Q. In fact, you exchanged these messages
21	severance which was calculated according to South	21	with Mr. Kim, correct?
22	Korean law, correct?	22	A. Yes.
23	A. No, Mr. Jo never send me a message and	23	Q. In fact, at the top of the page and
24	Mr. Kim never asked me to do that either.	24	Mr. Kim told you that severance pay is now available,
25	Q. Did anyone at the Mission ask you to	25	we wanted to check the message. Do you see that text
			-

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		11 yumuy 1 tun			1 4565 110121
1	message, sir	Page 118	1	that?	Page 120
2	Α.	Yes.	2	Α.	Yes.
3	Q.	And in fact you responded to that	3	Q.	You said "Understood." Correct?
4	saying I can	not call you for some reason, right?	4	Α.	Yes.
5	Α.	Correct.	5	Q.	Now, on August 13th Mr. Kim texts you
6	Q.	In fact, and then Mr. Kim in response	6	_	e let me know your account information so
7		"Do you want me to call you tomorrow?"	7	_	end you severance payment information."
8	Correct?		8	Do you see th	
9	Α.	Yes.	9	A.	Yes.
10	Q.	You say yes to that?	10	Q.	You responded to that saying you're
11	Α.	Yes.	11	fishing, corn	
12	Q.	And Mr. Kim on July 14 at 11:20 a.m.,	12	А.	Yes.
13	-	again "When you're available, please call	13	Q.	And Mr. Kim asked you "Are you not
14	me." Correct		14		ck up the check for severance?"
15	A.	Correct.	15	A.	Correct.
16	Q.	In response to that you said "My phone	16	Q.	He asked you again?
17	_	ng well. Call me now." Correct?	17	Α.	Yes.
18	A.	Yes.	18	Q.	You said "Thank you for taking care of
19	Q.	And on July 29, 9:29 a.m., Mr. Kim	19		Do you see your text there?
20	_	ain saying "Mr., when are you coming to	20	A.	Yes.
21		check for severance?" Correct?	21	Q.	Right?
22	A.	Yes.	22	Α.	Correct.
23	Q.	So you got this text, correct?	23	Q.	And you said "I can give you my wire
24	ν· Α.	Yes.	24		ormation," correct?
25	Q.	Now, Mr. Nam, why did you say why	25	A.	Yes.
25	٧.	Now, Mr. Nam, why did you say why	25	A.	ies.
	414 11 ₄ .	Page 119	_		Page 121
1	about severa	earlier that Mr. Kim never contacted you	1	Q.	In response Mr. Kim said "Let me know
2			2		wire it," correct?
3 4	A.	You know, I mean, it was never verbally	3 4	Α.	Yes.
5		. What I was trying to say was that I		Q.	You did not provide your wiring
		tiple times the severance pay was	5	information,	-
6		owever, I was not given a specific date	6	Α.	Correct.
7		ne severance check would be available.	7	Q.	So, once again, Mr. Nam, look me in the
8	Q.	In fact, if you turn to the next page, July 29, "I'll go see you on Monday or	8		you lie that no one at the Mission
10	_	use I'm in Maryland right now." Do you		A.	a about severance? I never said no one contacted me. I
11	see that text		10		never received a specific information as
12	A.	Yes.	12		where I would be receiving the severance
13	A. Q.	And then Mr. Kim responded to you	13	check.	ATTEL I WOULD BE LECETATED THE SEVERALICE
14		I'll see you then." Do you see that?	14	Q.	When Mr. Kim time and time again asked
15	A.	Yes.	15		ing to pick up the check, what's your
16	Q.	But you never went there on that day,	16	-	tion, did you ever provide your wire
17	correct?	but you have went diete on diat day,	17	information i	• • •
18	A.	Correct.	18		MR. ZHU: Objection. Argumentative.
19	Q.	And August 2nd at 1:50 p.m. Mr. Kim	19	The documents	s speaks for itself.
20		ain "Can I speak to you?"	20	A.	Well, you're insisting that I avoided
21	A.	Yes.	21		me check. However, I'm just trying to
22		You said "in 40 minutes," correct?	22		ituation to you what my situation was at
23	Q. A.	Yes.	23		was in Maryland and since I was not in
23 24	A. Q.	And Mr. Kim then said "I'll call you to	24		was in Maryland and since I was not in I was going to and then I was told
25			25	_	
43	discuss your	severance at the time." Do you see	45	chac once I (come to New Jersey, the severance pay

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				1 ugcs 122::125
1	would be pai	Page 122 d, however, I was never given information	1	Page 124 showing that you contacted Mr. Kim after August 17,
2	-	and where I should pick up the check.	2	2021. If you lied, you are committing perjury here.
3	Q.	On August 17 when Mr. Kim asked you	3	MR. ZHU: Objection. Argumentative.
4	_	rire information so they can wire it, you	4	Is there a question pending?
5	_	led that information, did you? Did you or	5	MR. LIM: Yes.
6	did you not?	·	6	Q. Do you understand that, sir?
7	А.	No.	7	A. How am I going to find the recording of
8		MR. ZHU: Objection. Let the witness	8	our conversation?
9	speak. You	have to let the witness speak.	9	Q. I want you to contact your phone
10	Ω.	Now, later on you said you don't know	10	company, get a phone record for the month of August
11	Mr. Kim's em	mail address, correct?	11	2021.
12	A.	Yes.	12	MR. ZHU: Objection. No question
13	Q.	But you do know his email address,	13	pending.
14	correct?	-	14	MR. LIM: Okay, I'm telling him.
15	A.	Well, I received his email address once	15	Q. And produce the record that
16	and I sent h	im an email. However, at some point that	16	indicates
17		with other emails just disappeared from	17	MR. ZHU: Please
18	_	So I contacted Microsoft and I found out	18	MR. LIM: Excuse me, I'm speaking.
19	those inform	mation those emails were gone.	19	Q. What did you say just say, sir? What
20	Q.	Then Mr. Kim asked you again "What is	20	did you just say?
21	your home ad	dress so that we can mail it?"	21	A. Why the heck
22	A.	Yes.	22	MR. LIM: Go off the record.
23	Q.	Now, he asked you what your bank	23	(Discussion off the record.)
24	account info	ormation was; you never did provide it.	24	MR. ZHU: Now we're back on the record.
25	He asked you	what your mailing address was; you never	25	Put on the record, please ask the question. Do
				D 125
1	provided, co	Page 123 prrect? Correct? Did you?	1	Page 125 not harass my client.
1 2	provided, co	e	1 2	Page 125 not harass my client. (REQ) Q. Excuse me. Please produce a phone record
	-	orrect? Correct? Did you?		not harass my client.
2	Α.	rrect? Correct? Did you? Yes, I did once.	2	not harass my client. (REQ) Q. Excuse me. Please produce a phone record
2 3	A. Q. A.	rrect? Correct? Did you? Yes, I did once. Okay. Show me your text.	2	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after
2 3 4	A. Q. A.	Yes, I did once. Okay. Show me your text. My recollection is that when we were on	2 3 4	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this
2 3 4 5	A. Q. A. the phone, I	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address.	2 3 4 5	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request.
2 3 4 5 6	A. Q. A. the phone, I	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17.	2 3 4 5	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement
2 3 4 5 6 7	A. Q. A. the phone, I	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question?	2 3 4 5 6 7	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing.
2 3 4 5 6 7 8	A. Q. A. the phone, I Q. Q. A.	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct?	2 3 4 5 6 7 8	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not
2 3 4 5 6 7 8 9	A. Q. A. the phone, I Q. A. remember even	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't	2 3 4 5 6 7 8 9	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised
2 3 4 5 6 7 8 9	A. Q. A. the phone, I Q. A. remember even	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim,	2 3 4 5 6 7 8 9	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text?
2 3 4 5 6 7 8 9 10 11	A. Q. A. the phone, I Q. A. remember even	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim,	2 3 4 5 6 7 8 9 10	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text? A. Now, at the time my plan was to go to
2 3 4 5 6 7 8 9 10 11 12	A. Q. A. the phone, I Q. A. remember even however, I m in it. Q.	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim, may have mailed a letter with my address	2 3 4 5 6 7 8 9 10 11	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text? A. Now, at the time my plan was to go to New Jersey, however, I got busy with other matters in
2 3 4 5 6 7 8 9 10 11 12 13	A. Q. A. the phone, I Q. A. remember even however, I min it. Q. which is on	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim, may have mailed a letter with my address. In response to Mr. Kim's last text	2 3 4 5 6 7 8 9 10 11 12 13	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text? A. Now, at the time my plan was to go to New Jersey, however, I got busy with other matters in Maryland.
2 3 4 5 6 7 8 9 10 11 12 13 14	A. Q. A. the phone, I Q. A. remember even however, I m in it. Q. which is on he asked you	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim, may have mailed a letter with my address In response to Mr. Kim's last text August 17, did you respond to this? When	2 3 4 5 6 7 8 9 10 11 12 13	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text? A. Now, at the time my plan was to go to New Jersey, however, I got busy with other matters in Maryland. Q. Did you notify the Mission that you
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Q. A. the phone, I Q. A. remember even however, I m in it. Q. which is on he asked you	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim, may have mailed a letter with my address. In response to Mr. Kim's last text August 17, did you respond to this? When a whether or not he should mail it to your	2 3 4 5 6 7 8 9 10 11 12 13 14	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text? A. Now, at the time my plan was to go to New Jersey, however, I got busy with other matters in Maryland. Q. Did you notify the Mission that you cannot make it either on Monday or Tuesday?
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Q. A. the phone, I Q. A. remember eve however, I m in it. Q. which is on he asked you home address	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim, may have mailed a letter with my address In response to Mr. Kim's last text August 17, did you respond to this? When whether or not he should mail it to your is, did you respond to that? I had a phone call afterward and I told	2 3 4 5 6 7 8 9 10 11 12 13 14 15	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text? A. Now, at the time my plan was to go to New Jersey, however, I got busy with other matters in Maryland. Q. Did you notify the Mission that you cannot make it either on Monday or Tuesday? A. I don't recall. I may have.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Q. A. the phone, I Q. A. remember eve however, I m in it. Q. which is on he asked you home address A.	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim, may have mailed a letter with my address In response to Mr. Kim's last text August 17, did you respond to this? When whether or not he should mail it to your is, did you respond to that? I had a phone call afterward and I told	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text? A. Now, at the time my plan was to go to New Jersey, however, I got busy with other matters in Maryland. Q. Did you notify the Mission that you cannot make it either on Monday or Tuesday? A. I don't recall. I may have. MR. LIM: Give me five minutes. I'm
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Q. A. the phone, I Q. A. remember even however, I min it. Q. which is on he asked you home address A. him to send	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim, may have mailed a letter with my address. In response to Mr. Kim's last text August 17, did you respond to this? When a whether or not he should mail it to your is, did you respond to that? I had a phone call afterward and I told it.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text? A. Now, at the time my plan was to go to New Jersey, however, I got busy with other matters in Maryland. Q. Did you notify the Mission that you cannot make it either on Monday or Tuesday? A. I don't recall. I may have. MR. LIM: Give me five minutes. I'm going to review my questions and maybe we'll be done.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q. A. the phone, I Q. A. remember even however, I m in it. Q. which is on he asked you home address A. him to send Q.	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim, may have mailed a letter with my address. In response to Mr. Kim's last text August 17, did you respond to this? When a whether or not he should mail it to your is, did you respond to that? I had a phone call afterward and I told it.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text? A. Now, at the time my plan was to go to New Jersey, however, I got busy with other matters in Maryland. Q. Did you notify the Mission that you cannot make it either on Monday or Tuesday? A. I don't recall. I may have. MR. LIM: Give me five minutes. I'm going to review my questions and maybe we'll be done. (Recess taken.)
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Q. A. the phone, I Q. A. remember eve however, I m in it. Q. which is on he asked you home address A. him to send Q. with you? A.	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim, may have mailed a letter with my address. In response to Mr. Kim's last text. August 17, did you respond to this? When a whether or not he should mail it to your st, did you respond to that? I had a phone call afterward and I told it. Okay. Now, do you have the same phone	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text? A. Now, at the time my plan was to go to New Jersey, however, I got busy with other matters in Maryland. Q. Did you notify the Mission that you cannot make it either on Monday or Tuesday? A. I don't recall. I may have. MR. LIM: Give me five minutes. I'm going to review my questions and maybe we'll be done. (Recess taken.) BY MR. LIM:
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. A. the phone, I Q. A. remember eve however, I m in it. Q. which is on he asked you home address A. him to send Q. with you? A.	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim, may have mailed a letter with my address In response to Mr. Kim's last text August 17, did you respond to this? When a whether or not he should mail it to your is, did you respond to that? I had a phone call afterward and I told it. Okay. Now, do you have the same phone No, I don't have the same phone with me	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text? A. Now, at the time my plan was to go to New Jersey, however, I got busy with other matters in Maryland. Q. Did you notify the Mission that you cannot make it either on Monday or Tuesday? A. I don't recall. I may have. MR. LIM: Give me five minutes. I'm going to review my questions and maybe we'll be done. (Recess taken.) BY MR. LIM: Q. Mr. Nam, did you know or do you know
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. A. the phone, I Q. A. remember eve however, I m in it. Q. which is on he asked you home address A. him to send Q. with you? A. but using my	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim, may have mailed a letter with my address. In response to Mr. Kim's last text August 17, did you respond to this? When a whether or not he should mail it to your is, did you respond to that? I had a phone call afterward and I told it. Okay. Now, do you have the same phone No, I don't have the same phone with me is previous phone, that's what I said.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text? A. Now, at the time my plan was to go to New Jersey, however, I got busy with other matters in Maryland. Q. Did you notify the Mission that you cannot make it either on Monday or Tuesday? A. I don't recall. I may have. MR. LIM: Give me five minutes. I'm going to review my questions and maybe we'll be done. (Recess taken.) BY MR. LIM: Q. Mr. Nam, did you know or do you know that according to South Korean laws even if you sign
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Q. A. the phone, I Q. A. remember evenomer in it. Q. which is on he asked you home address A. him to send Q. with you? A. but using my Q.	Yes, I did once. Okay. Show me your text. My recollection is that when we were on gave him my address. So it must be after August 17. MR. ZHU: Is there a question? Correct? No, they knew my address. I don't er receiving any emails from Mr. Kim, may have mailed a letter with my address. In response to Mr. Kim's last text August 17, did you respond to this? When a whether or not he should mail it to your standard it. Okay. Now, do you have the same phone No, I don't have the same phone with me previous phone, that's what I said. When did you change your phone?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	not harass my client. (REQ) Q. Excuse me. Please produce a phone record that indicates that you did speak to Mr. Kim after August 17. Okay? We're going to follow up on this request. MR. ZHU: We take it under advisement and we request that request to be put in writing. Q. Can you explain to me why you did not go the following Monday or Tuesday as you promised you would according to your text? A. Now, at the time my plan was to go to New Jersey, however, I got busy with other matters in Maryland. Q. Did you notify the Mission that you cannot make it either on Monday or Tuesday? A. I don't recall. I may have. MR. LIM: Give me five minutes. I'm going to review my questions and maybe we'll be done. (Recess taken.) BY MR. LIM: Q. Mr. Nam, did you know or do you know that according to South Korean laws even if you sign a contract for a term of one year, if you end up

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1	Page 126 know that?	1	Page 128 MR. ZHU: Objection. Foundation.
2	A. Yes. Now, at the time I didn't know	2	A. Now, this was not a legal consultation
3	about it but at some point I saw on the Internet that	3	but what I saw on the Internet was just a question
4	if I worked for more than two years, then I would be	4	and answer and the answer was with regard to somebody
5	subject to age 60 retirement requirement. This was a	5	working more than two years under a one-year
6	one-year contract.	6	contract, automatically that employment would be
7	(DIR) Q. And did you ever consult a lawyer	7	considered the long-term contract and that employee
8	in Korea whether or not if you end up working for	8	would be under the mandatory retirement age.
9	more than two years even if you have a one-year	9	Q. Okay. There is no question pending.
10	contract, you are required to retire at the age of	10	MR. ZHU: You have to let the witness
11	60?	11	finish. He hasn't finished.
12		12	Q. Go ahead.
13	MR. ZHU: Objection as privileged	13	-
	information. I instruct my client to not answer.	1	
14	Do not answer.	14	you are under a one-year contract, then this doesn't
15	MR. KWAK: That is not privileged.	15	apply to you. That's what it said.
16	MR. LIM: That's not privileged.	16	Q. That's what the Internet says?
17	MR. KWAK: Do not answer. MR. LIM: Hold on.	17	A. Yes.
18		18	Q. You don't know the author of that, do
19	(DIR) Q. I'm not asking what the attorney	19	you?
20	told you. Did you ever contact a lawyer? That's my	20	A. So this was somebody who works for the
21	question.	21	labor department in Korea and that person was
22	MR. ZHU: Do not answer.	22	answering a question.
23	MR. LIM: No, that's don't do that.	23	Q. Do you know the name of the person?
24	MR. ZHU: I already did.	24	A. I do not know.
25	MR. KWAK: Whether someone contacted	25	MR. LIM: Mark this.
	Page 127		Page 129
1	MR. LIM: Contacted is not privileged	1	(Defendant's Exhibit 15, letter from
2	information.	2	the Ministry of Foreign Affairs of the
3	MR. ZHU: You have the substance.	3	Republic of Korea, was marked for
4	MR. KWAK: Their discussion is	4	identification.)
5	MR. ZHU: That is substance.	5	Q. Well, Mr. Nam, you just testified that
6	MR. KWAK: It's contacting a lawyer to	6	when you checked someone at the Department of Labor
7	seek legal advice. That's it.	7	via Internet, the answer you received was it really
8	MR. LIM: We're going to rephrase the	8	depends on the policy of the organization that you
9	question.	9	work for, correct?
10	MR. ZHU: Rephrase the question.	10	A. Yes, as far as I can remember, that's
11	BY MR. LIM:	11	what it said.
12	Q. Did you ever contact a lawyer in Korea?	12	Q. Okay. According to the internal
13	MR. ZHU: Don't put a subject.	13	policies of the Mission, are you aware that according
14	Q. Did you ever contact a lawyer in Korea	14	to Article 62 retirement age is at 60?
15	to find out about the labor laws?	15	MR. ZHU: Objection. Foundation.
16	A. No.	16	Q. Do you know that?
17	Q. So all your knowledge of South Korean	17	A. I didn't know about it.
18	labor law is based on what you saw on the Internet?	18	Q. Now, if you look at Article 64, it
19	A. Yes.	19	shows how severance should be paid. And do you know
20	Q. Okay. So as you sit here today, is	20	whether or not the severance you have not picked up
21	this the first time you ever heard that in Korea even	21	yet strike that.
22	if you have a one-year contract, if you end up	22	Do you know that the severance you have
		23	not picked up yet has been computed based on Article
23	working more than two years, the mandatory retirement		
	working more than two years, the mandatory retirement age would apply? This is the first time you heard it?	24 25	64? A. I didn't know about it. I thought it

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Page 130
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                                                              1
                                                                          Ο.
                                                                                  All right. I have no further
1
    was calculated based on the calculation that appears
                                                                  questions.
2
    on my employment contract.
3
                  Isn't it true that Mr. Jo here also
                                                              3
                                                                                  MR. LIM: Okay. Thank you.
           ٥.
    told you that according to this internal policy, the
                                                              4
                                                                                  (Witness excused.)
                                                              5
                                                                                  (Time noted: 3:54 p.m.)
5
    Ministry of Foreign Affairs Guidelines, you had to
                                                              6
6
    retire at the age of 60? Didn't they tell you that,
    correct?
7
                                                              8
8
           A.
                  Yes.
9
           ٥.
                  Nothing further.
                                                              9
                                                             10
10
                  MR. ZHU: I have a few follow-up.
                                                             11
11
    Redirect.
                                                             12
12
    EXAMINATION
                                                             13
13
    BY MR. ZHU:
                                                             14
14
                   Earlier you said you need to clarify a
                                                             15
15
    question concerning whether any driver drove the car
                                                             16
16
    you being assigned. You said you have something to
                                                             17
17
    clarify. Can you speak it now?
                                                             18
18
           Α.
                  I was told that the official vehicle
                                                             19
19
    shall be used for official purposes only and I
20
    strictly abide by that rule. And, however, from time
                                                             20
                                                             21
21
    to time when I had to go to work not for work
                                                             22
22
    purposes, on weekends, I did use that vehicle.
23
                  I put what's in front of you D-2, Bates
                                                             23
                                                             24
24
    stamped 19. Earlier you said you have something to
                                                             25
25
    say about minister's signature. What are you about
                                                   Page 131
                                                                                                                Page 133
                                                                                         CERTIFICATE
    to say at that time?
                                                              1
2
           Α.
                  Are you talking about the signature of
                                                              2
                                                                  STATE OF NEW YORK
3
    Mr. Ko?
                                                              3
                                                                                       :ss.
                                                                  COUNTY OF NEW YORK
           Ο.
                   Yes.
                                                              4
5
           Α.
                   No, I have nothing to say about that
                                                              5
6
    signature.
                                                              6
                                                                                I, CELESTE A. GALBO, a Registered
7
                                                              7
                                                                  Professional Reporter, Register Merit Reporter and
           Ο.
                   Okav.
                   I mean, I wanted to say that prior to
                                                              8
                                                                  Notary Public of the State of New York and State of
    signing this document, I didn't have sufficient time
                                                              9
                                                                  New Jersey, do hereby certify:
10
    to read and understand this document and therefore I
                                                             10
                                                                                THAT HYUNHUY NAM the witness whose
    didn't fully understand the content of this document.
11
                                                             11
                                                                  deposition is hereinbefore set forth, was remotely
12
   However, my signing this document was more of a
                                                                  duly sworn by me and that such deposition is a true
13
                                                                  record of the testimony given by the witness.
    reactionary -- it was reactionary more than anything
                                                             13
14
    else.
                                                             14
                                                                                I further certify that I am not related
15
                                                                  to any of the parties to this action by blood or
           Ο.
                  Earlier you gave some testimony about
                                                             15
16
    the national interests of the Republic of Korea. Can
                                                             16
                                                                  marriage, and that I am in no way interested in the
17
    you specify your understanding of the national
                                                             17
                                                                  outcome of this matter.
18
    interests of the Republic of Korea, what does that
                                                             18
                                                                                IN WITNESS WHEREOF, I have hereunto set
                                                                  my hand this 28th day of February 2022.
19
    mean?
                                                             19
20
                                                             20
                  I never really thought about national
                                                                                    Jelost Walds
21
    interests, I just focused on what I could do as far
                                                             21
   as what I was -- as far as the test that I was given
23
    and so I drove an official car. I assisted these
                                                             23
                                                                                CELESTE A. GALBO, RPR, RMR
24
    officers by driving them and I believe that's how I
                                                             24
   was helping the national interest.
                                                             25
```

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS Hyunhuy Nam on 02/22/2022 Pages 134..136

	Page 134			Page 136
1	DEPOSITION ERRATA SHEET	1	DEPOSITION ERRATA SHEET	
2	Case Caption: Hyunhuy Nam vs. Permanent Mission of	2	Page NoLine NoChange to:	
3	the Republic of Korea to the United Nations	3		
	DECLARATION UNDER PENALTY OF PERJURY	4	Reason for change:	
4		5	Page NoLine NoChange to:	
5	I declare under penalty of perjury that I have	6		
6	read the entire transcript of my Deposition taken in	7	Reason for change:	
7	the captioned matter or the same has been read to me,	8	Page NoLine NoChange to:	
8	and the same is true and accurate, save and except	9		
9	for changes and/or corrections, if any, as indicated	10	Reason for change:	
10	by me on the DEPOSITION ERRATA SHEET hereof, with the	11	Page NoLine NoChange to:	
11	understanding that I offer these changes as if still	12	December 6 and beautiful and a second a second and a second a second and a second a second and a second and a second and a	
12	under oath.	13	Reason for change:	
13	HYUNHUY NAM	14	Page NoLine NoChange to:	
15	Subscribed and sworn to on theday of,	15	December 6 and beautiful and a second a second and a second a second and a second a second and a second and a second and a	
16	20 before me.	16	Reason for change:	
17	· <u> </u>	17	Page NoLine NoChange to:	
18		18	December 6 and beautiful and a second a second and a second a second and a second a second and a second and a second and a	
19	Notary Public,	19	Reason for change:	
20	In and for the State of New York	20	Page NoLine NoChange to:	
21		21	Decree for themselves	
22		23	Reason for change:	
23		24	SIGNATURE:DATE:	
24		25	SIGNATURE - DATE -	
25		23		
1	Page 135 DEPOSITION ERRATA SHEET			
2	Page NoLine NoChange to:			
3	rage Nonine Noenange to			
4	Reason for change:			
5	Page NoLine NoChange to:			
6				
7	Reason for change:			
8	Page NoLine NoChange to:			
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10	Reason for change:			
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24				
25	Reason for change:			